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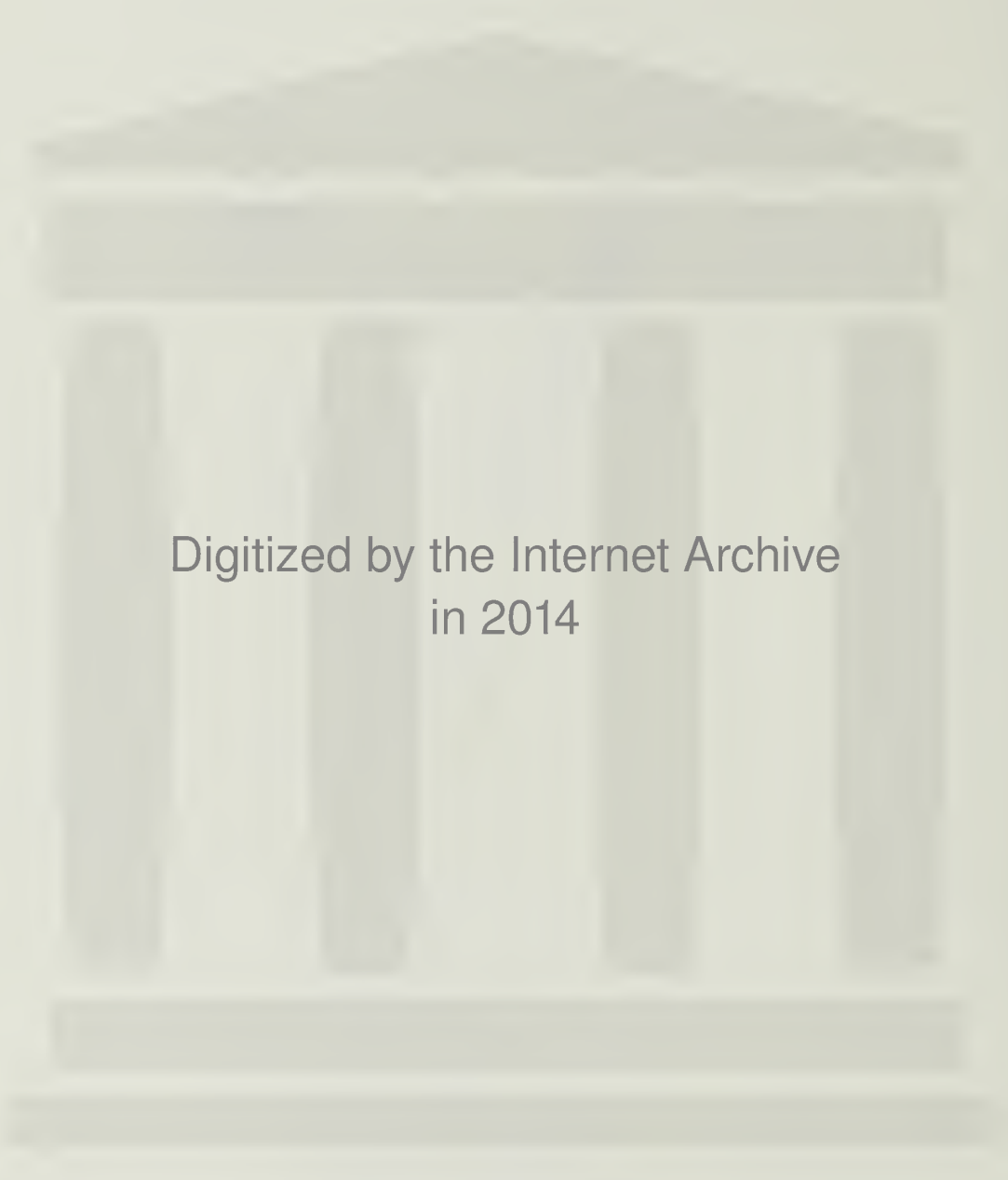
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San Francisco Planning Department

ASIAN ART MUSEUM

Final Supplemental Environmental Impact Report

97.750E

Draft SEIR Publication Date: July 18, 1998
Draft SEIR Public Hearing Date: August 20, 1998
Draft SEIR Public Comment Period: July 18, 1998 - August 20, 1998
Final SEIR Certification Date: December 10, 1998

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File No. 97.750E: Asian Art Museum,
Address: 200 Larkin Street
Assessor's Block 353, Lot 1

SAN FRANCISCO
PLANNING COMMISSION
MOTION NO. 14749

ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED NEW ASIAN ART MUSEUM, LOCATED AT 200 LARKIN STREET, THE ENTIRE BLOCK BOUNDED BY LARKIN, FULTON, HYDE AND MCALLISTER STREETS, IN THE CIVIC CENTER.

MOVED, That the San Francisco Planning Commission (hereinafter "Commission") hereby CERTIFIES the Final Supplemental Environmental Impact Report (hereinafter SEIR) identified as case file No. 97.750E: Asian Art Museum, (hereinafter "Project") based upon the following findings:

1) The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et seq., (hereinafter "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

a. On February 27, 1992, the Planning Commission certified a Final EIR, San Francisco Main Library (Case No. 90.808E, also referred to as the Main Library/Asian Art Museum FEIR), for a three-part project including construction of a new Main Library; conversion of the old Main Library building for use by the Asian Art Museum; and construction of a pedestrian mall on Fulton Street between the two buildings.

b. The Planning Department prepared an EIR Addendum, dated May 1, 1996, that reviewed the Asian Art Museum portion of the project in light of changes in circumstances subsequent to certification of the prior EIR.

c. The Department determined that a Supplemental EIR was required. The SEIR supplements information and analysis contained in the prior EIR and Addendum. It contains new descriptive material about alterations to the old Main library building including new information that was not known at the time of FEIR certification or publication of the EIR Addendum. The SEIR thus provides updated information about the project design and evaluates associated impacts. The SEIR includes additional analysis of alternatives, including alternatives that would reduce effects on historic architectural resources, and discusses effects related to urban design, shadow, transportation and air quality, in light of the more detailed design information now available. And,

d. On July 18, 1998, the Department published the Draft Supplemental Environmental Impact Report (hereinafter "DSEIR") and provided public notice in a newspaper of general circulation of the availability of the DSEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DSEIR; this notice was mailed to the Department's list of persons requesting such notice.

e. Notices of availability of the DSEIR and of the date and time of the public hearing were posted at and near the project site on July 29, 1998.

f. On July 18, 1998 copies of the DSEIR, or a notice of its availability were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, to adjacent property owners, and to government agencies, the latter both directly and through the State Clearinghouse.

g. Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on July 17, 1998.

2) The Commission held a duly advertised public hearing on said Draft Supplemental Environmental Impact Report on August 20, 1998 at which opportunity for public comment was given, and public comment was received on the DSEIR. The period for acceptance of written comments ended on August 20, 1998.

3) The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 33-day public review period for the DSEIR, prepared revisions to the text of the DSEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DSEIR. This material was presented in a "Draft Summary of Comments and Responses," published on November 30, 1998, was distributed to the Commission and to all parties who commented on the DSEIR for whom addresses were available, and was available to others upon request at Department offices.

4) A Final Supplemental Environmental Impact Report has been prepared by the Department, consisting of the Draft Supplemental Environmental Impact Report, and the Summary of Comments and Responses all as required by law.

5) Project Supplemental Environmental Impact Report files have been made available for review by the Commission and the public. These files are available for public review at the Department offices at 1660 Mission Street, and are part of the record before the Commission.

6) On December 10, 1998, the Commission reviewed and considered the Final Supplemental Environmental Impact Report and found that the contents of said report and the procedures through which the Final Supplemental Environmental Impact Report was prepared, publicized and reviewed comply with the provisions of CEQA, the CEQA Guidelines and Chapter 31.

7) The Planning Commission hereby does find that the Final Supplemental Environmental Impact Report concerning File No. 97.750E: reflects the independent judgment of the City and County of San Francisco, is adequate, accurate and objective, and that the Summary of Comments and Responses contains

no significant revisions to the Draft Supplemental Environmental Impact Report, and hereby does CERTIFY THE COMPLETION of said Final Supplemental Environmental Impact Report in compliance with CEQA and the CEQA Guidelines.

8) The Commission, in certifying the completion of said Final Supplemental Environmental Impact Report, hereby does find that the project described in the Supplemental Environmental Impact Report:

a. Will have a project-specific significant effect on Historic Architectural Resources. The Asian Art Museum would retain and adaptively reuse the old Main Library building. However, the plan would result in demolition or alteration of much of the interior of the old Main Library building, including a number of spaces designated as Exceptionally Significant Interior Spaces in the Planning Code (Appendix J of Article 10 (Sec.10)). Therefore, the project would result in a significant unavoidable effect on Historic Architectural Resources.

b. Could potentially have a project-specific significant effect on Shadow, in that it would add shadow to Civic Center Plaza; this park is under the jurisdiction of the Recreation and Park Department and subject to the requirements of the sunlight ordinance (Planning Code Section 295). The project would cause an increase of 0.116 percent above the Absolute Cumulative Limit of one percent for Civic Center Plaza. The one percent has already been absorbed by other recent development; total shadow with recent development plus the project, therefore, would be 1.116 percent compared to the baseline when the Absolute Cumulative Limit was established.

The additional shadow due to the project would not be expected to interfere with use of the Plaza, nor would it conflict with qualitative criteria adopted by the Planning and Recreation and Park Commissions, which call for afternoon sun. The mechanical penthouse on the proposed Asian Art Museum would add new shadow to the plaza from March through September in early morning hours before 9 a.m., when the sun is low on the horizon. After these hours, the sun would be high enough that the penthouse would cause no new shadow. From October through February the sun is too far south for the old Main Library building including the proposed new mechanical penthouse to cast new shadow on the plaza. New project shadow would represent about 0.116 percent (about one-ninth of one percent) of the total year round square-foot-hours of sunlight on this plaza when the Section 295 criteria were established.

In view of the above, new project shadow would not be substantial. However, new project shadow would exceed the Absolute Cumulative Limit for Civic Center Plaza, and would require either that the two commissions find the new shadow to be *de minimis*, or that they increase the Absolute Cumulative Limit for the plaza. Until either action occurs, new project shadow is considered potentially significant. And,

c. Will have a significant cumulative impact, in that cumulative development in the Greater Downtown and Vicinity in San Francisco (which includes the project site) would have a significant effect on the environment in that it would contribute to cumulative traffic increases as well as cumulative passenger loadings on MUNI, BART and other regional transit carriers. These cumulative transportation impacts could cause violations of air quality standards. The proposed project would contribute incrementally to these cumulative effects.

SAN FRANCISCO PLANNING COMMISSION

File No. 97.750E: Asian Art Museum
Address: 200 Larkin Street
Assessor's Block 353, Lot 1
Motion No. 14749
Page 4

I hereby certify that the foregoing Motion was ADOPTED by the Planning Commission at its regular meeting of December 10, 1998.

Jonas Ionin
Commission Secretary

AYES: Commissioners Chinchilla, Mills, Hills, Antenore, Theoharis, Joe and Martin

NOES: None

ABSENT: None

ADOPTED: December 10, 1998

San Francisco Planning Department

ASIAN ART MUSEUM

Final Supplemental Environmental Impact Report

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*Changes from the text of the Draft EIR are indicated by a line (l) in the margin.
Each new page and each new or revised graphic or table is indicated by a dot (●).*

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INTRODUCTION

On February 27, 1992, the City Planning Commission certified a Final EIR, *San Francisco Main Library* (Case No. 90.808E), for a three-part project including construction of a new Main Library (now complete) on the block bounded by Larkin, Fulton, Hyde and Grove Streets; conversion of the old Main Library building, on the block bounded by Larkin, McAllister, Hyde and Fulton Streets, for use by the Asian Art Museum; and construction of a pedestrian mall on Fulton Street between Larkin and Hyde Streets. That FEIR is referred to herein as the "Main Library/Asian Art Museum FEIR."

The Planning Department prepared an EIR Addendum, dated May 1, 1996, that reviewed the Asian Art Museum portion of the project in light of changes in circumstances subsequent to certification of the Main Library/Asian Art Museum FEIR. These changes included approval by the Board of Supervisors of the Civic Center as a local Historic District under Article 10 of the Planning Code, and certification by the State of California of a Final EIR for a state office building that reached a different conclusion about transportation effects, from generally the same data and analysis, than did the Main Library/Asian Art Museum FEIR.

The Addendum concluded that there was no substantial change in the environmental effects of the Asian Art Museum project and that no revisions were needed in the Main Library/Asian Art Museum FEIR because there was no substantial change in the project and, based on the analysis of changes in circumstances in the project, no new information came to light that would indicate the potential for new significant impacts or a substantial increase in severity of significant impacts previously identified in the Main Library/Asian Art Museum FEIR.

On May 7, 1996, and June 16, 1996, respectively, the Library Commission and the Board of Supervisors approved the transfer of the old Main Library building from the jurisdiction of the Library Commission to that of the Asian Art Commission. On July 1, 1996, the Planning Department granted the Asian Art Museum a Certificate of Appropriateness under Article 10 of the Planning Code for installation of an exterior sign identifying the building as the Asian Art Museum and as the Chong-Moon Lee Center for Asian Art and Culture. A Certificate of Appropriateness was also approved for demolition of a former city office and library annex building at 45 Hyde Street; it was demolished in November 1997. No other approvals have been granted for conversion of the old Main Library building to use by the Asian Art Museum.

The City Planning Commission, in certifying the Main Library/Asian Art Museum FEIR, identified a significant impact on architectural and historic resources due to alteration of the old Main Library building. At the time the FEIR was certified, and at the time the EIR Addendum was published, proposed alterations to the existing Main Library building to accommodate the

Asian Art Museum were based on a 1988 conceptual design (William Turnbull Associates, 1988).

Since publication of the EIR Addendum, the Asian Art Commission selected an architect and proceeded with the museum design. Based on this more detailed design work, alteration of the old Main Library building would be the same, in part, as analyzed in the prior EIR, and in some respects the alterations would be different.

This Supplemental EIR (SEIR), therefore, contains new descriptive material about alterations to the old Main Library building including new information that was not known at the time of FEIR certification or publication of the EIR Addendum, that could potentially affect the significant impact of the project as previously evaluated, or the severity of the previously identified significant impact, on historic architectural resources. The SEIR thus provides updated information about the project design and evaluates associated impacts. The SEIR also includes additional analysis of alternatives, including alternatives that would reduce effects on historic architectural resources.

This SEIR also discusses effects related to urban design, shadow, transportation, and air quality, in light of the more detailed design information now available, as well as potential changes in circumstances or potential new information that could affect project impacts. Effects for topics other than those iterated above would not be expected to differ from those analyzed in the Main Library/Asian Art Museum FEIR, as updated by the 1996 EIR Addendum, and no new analysis is required. These topics are noted at the beginning of Chapter III.

REFERENCES - Introduction

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, as part of the project file.

William Turnbull Associates, *Asian Art Museum - Main Public Library Building: A Feasibility Study*, April 1988

CHAPTER I

SUMMARY

A. PROJECT DESCRIPTION

The project is adaptive reuse of the old Main Library building by the Asian Art Museum including: seismic upgrade, alterations to the exterior and interior of the building and an underground extension that would be about 12 feet above grade at 45 Hyde Street. (Future phases analyzed include construction of an auditorium/theater with offices above (to about 80 feet) at 45 Hyde Street, and extension of the McAllister wing towards Hyde Street. These two phases are not currently funded.) Main components of the project include 1) seismic upgrade of the old Main Library, 2) exterior alterations including a new mechanical penthouse/roof element about 16 feet tall; removal of cement statues on the Larkin Street facade, new doorways and lengthened windows on the Fulton facade, new door openings on the McAllister and Hyde frontages; construction of seismic moat; an outdoor dining area on Fulton; and enclosure of existing light courts to form an interior Central Court. A loading dock would have access on Hyde Street. 3) Interior alterations would include the following: retention of the Main Entrance Hall and Vestibule and Monumental Grand Staircases, and Great Hall; alteration of the second floor loggia including demolition of non-supporting walls and removal (and relocation) of Piazzoni Murals; addition of a new third floor including inside the south and west reading rooms; demolition of large portions of the ground and existing third floors for adaptive reuse, including creation of a three-story-tall Central Court that would surround the Monumental Staircase; and demolition of seven-story library stacks for use as museum space; conversion of library spaces to galleries, classrooms, research library, offices, museum store and cafe. No parking would be provided.

The proposed project would seismically strengthen and remodel the old Main Library building to accommodate gallery, office, conservation, research, education, retail, and storage space for the museum, which is currently located in Golden Gate Park. The project would include exterior and interior alterations to the old Main Library building, a Contributory building within the local Civic Center Historic District and within a Historic District and a National Historic Landmark District, both listed on the National Register of Historic Places. The project would include approximately 180,000 gross square feet (gsf), or about 3 percent more space than was used by the library. Subject to available funding, the project would also include future construction of approximately 68,500 gsf of additional space at 45 Hyde Street, bringing the program to about 248,500 gsf.

The base program would provide about twice the space of the museum's existing 90,000-gsf space in Golden Gate Park; the increase in square footage of usable program space would be about 65 percent, from 73,000 sq. ft. to 121,500 sq. ft. Gallery (exhibit) space would increase

over that in the existing Museum by more than 25 percent, primarily through the addition of gallery space, not available in the existing museum, for mounting temporary exhibitions that would avoid having to store portions of its permanent collection, during such exhibitions.

Seismic strengthening would include the installation of a base isolation foundation system and concrete shear walls. The new foundation system would have approximately 200 isolators, which act like horizontal shock absorbers in an earthquake, allowing the building to move somewhat independently of ground motion, and would require excavation of a moat approximately two-and-one-half feet wide around the entire building to allow for this independent movement. The shear walls would be constructed essentially as concrete tubes at the four corners of the building and at the Great Hall, and would provide additional lateral (shear) strength against horizontal forces. They would be constructed inside the existing exterior walls, requiring removal of interior walls, except at the Great Hall, where the shear walls would be constructed around the exterior walls of this portion of the building to preserve the Great Hall's interior finish materials. Unreinforced masonry (brick) walls in the two interior light courts and on the east facade would be replaced, with a stucco-like finish for those that would remain exterior walls and with a waxed plaster finish for newly created interior walls.

The project would install a 16-foot-tall mechanical penthouse / screen, set back above the Larkin Street facade, to screen new rooftop mechanical equipment. Other exterior changes would include installation of new doorways; installation of new windows with white translucent glass inside the existing two-story windows on the primary Larkin and Fulton Street facades and installation of opaque glass on the McAllister Street facade; removal of statues above the Larkin Street entrance; removal of brick walls and windows on the secondary Hyde and McAllister Street facades; construction of an outdoor dining terrace and a garden along the Fulton Street wing; and expansion of the existing basement, or lower level, onto part of the 45 Hyde Street portion of the site.

Interior changes would include creation of a new Central Court by enclosure of existing light courts and demolition of large portions of the light court walls, including the walls of the second floor stair loggia, where existing murals on canvas by Gottardo Piazzoni are located. The Piazzoni murals are proposed for conservation and relocation off-site.

Under the proposed circulation plan, visitors would enter the museum collections at control points within the Central Court, and use a new glass-enclosed stairway (or escalators) or an elevator to reach the second- and third-floor permanent collection. They could also enter the galleries via the existing Monumental Staircase. However, the building's existing circulation pattern, which progresses through a series of ceremonial spaces, would be altered.

Primary exhibition galleries would be in the former large reading rooms (the former Literature and History departments) on the second floor, including a new third floor level to be installed within those spaces. The two-story Great Hall, which most recently served as the library General Reference room, would be converted to a space for exhibitions, lectures, special events, and overflow gallery space. On the ground floor, the former Children's reading room and an adjoining office would be converted to classrooms. The former Lurie Room would be divided

into four rooms for volunteers and docents and a resource center. The former Fine Arts department would become the cafe and kitchen; the cafe would include an outdoor terrace, on the grass-covered, tree-lined area atop the building's base. The existing Fulton Street entrance lobby would be converted to a dining room as part of the museum cafe, and the door fixed shut. The former Business, Science and Technology and Government Documents department would become a temporary exhibition gallery, as would the former ground floor stacks and staff room in the northwest corner of the building. Existing offices and storerooms beneath the Monumental Staircase would accommodate a museum store. On the fourth floor (old Main Library third floor), the Periodicals room and library office space would become a research library and museum offices, while the San Francisco History Room and the remainder of the existing third floor would become offices and meeting rooms for museum staff.

Project construction is anticipated to begin in early 1999 and last 24 to 30 months, with opening of the museum, following a move-in period, planned for the third quarter of 2001. Construction cost is estimated at \$123 million (1998 dollars), including seismic strengthening and construction, with an additional projected cost of \$22 million for the potential future Phase 2 and 3 expansion space.

The project architect is a joint venture of Hellmuth, Obata, Kassabaum, Inc.; LDA Architects; and Robert B. Wong - Architect, in association with Dott. Arch. Gae Aulenti, FAIA. The project preservation architect is Page & Turnbull.

The project requires approval of a Certificate of Appropriateness for exterior and interior alterations to the old Main Library building by the City Planning Commission, with advice of the Landmarks Preservation Advisory Board. The project may require a finding of project consistency with the General Plan by the City Planning Department. The City Planning and Recreation and Park Commissions must determine significance of new project shadow on Civic Center Plaza and, if the shadow were not found to be *de minimus*, the project would require revision of the Absolute Cumulative Limit on this open space, under the sunlight ordinance to allow for project shadow on this space (Planning Code Sec. 295). The project would require a Variance for less than the Planning Code-required amount of parking. Funding appropriation must be approved by the Board of Supervisors for renovation of the old Main Library building to accommodate the Asian Art Museum. The Asian Art Commission must also approve the project. Finally, the proposed project requires demolition and building permits from the Department of Building Inspection.

Subject to available funding, the project calls for construction of a two-phase addition to the old Main Library building at 45 Hyde Street, to include a three-story addition atop the currently proposed lower level expansion. This 80-foot-tall Phase 2 addition would contain a 400-seat auditorium/theater and two levels of museum office space. The future Phase 3 addition, also dependent on future funding, would include a base-isolated extension of the existing building's north wing to provide additional gallery space. This addition, if built, is envisioned to continue the old Main Library's McAllister Street facade east to near Hyde Street, also at 80 feet in

height. It would include galleries, museum office space, work rooms, storage, and other service space.

B. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

The principal issue addressed in this supplemental environmental impact report is the effect of the project on Historic Architectural Resources. As described below, and more fully in Chapter III, the project would significantly alter the old Main Library building, a contributory building in the local Civic Center Historic District and in both a National Register of Historic Places Historic District and a National Historic Landmark District. Alterations would occur principally in the interior, where the Asian Art Museum project would alter the existing interior circulation pattern, install a new third floor level, demolish interior spaces and elements, and remove existing works of art, including murals by Gottardo Piazzoni and Frank duMond. While the project sponsor feels the proposed alterations are necessary for a vital museum, others have questioned the design scheme because it would substantially alter the building's historic interior, including removal of the Piazzoni murals.

C. MAIN ENVIRONMENTAL EFFECTS

HISTORIC ARCHITECTURAL RESOURCES (p. 57)

The proposed project would have a significant impact on historic architectural resources, in that it would demolish most of the interior area of the old Main Library building, including a number of spaces identified as Exceptionally Significant Interior Spaces in the Planning Code (Appendix J of Article 10 (Sec. 10)). The project would include demolition of the panels in the outer walls of the second-floor loggia that contain the Piazzoni murals, and removal of the Piazzoni murals, retaining other wall elements including the columns, wall base and entablature (including inscriptions) and constructing new columns; demolition of ground floor elevator lobbies; construction of a new floor level within the second-story reading rooms; partial demolition of the north wall of the Fulton Street reading room by construction of large openings at the second and new third floors; and demolition of north and south portions of the east wall of the Larkin Street reading room; as well as demolition of other spaces identified in building survey reports as having historic architectural merit. The project would alter the existing circulation pattern, or parti, characteristic of the building's original Beaux Arts design, by removing the Monumental Staircase as the primary entrance to the building's major interior spaces.

A Certificate of Appropriateness is required for major alterations to the building exterior and to the Exceptionally Significant Interior Spaces identified in the Planning Code. A Certificate of Appropriateness would require approval by the Planning Commission on the advice of the Landmarks Preservation Advisory Board.

The project would alter the existing exterior facades of the old Main Library building, including installation of a hipped-roof mechanical penthouse and screen; construction of new doors, elimination of some existing windows; creation of an outdoor garden and outdoor dining area; removal of existing statuary and installation of new statuary; changes in windows and/or glazing; and removal of existing brick from the secondary east facade and from the north side of the south

wing and the light courts. The EIR preparers believe that project effects on the local and national historic districts would not be considered significant because the majority of changes to the building would be on its interior, exterior changes would be limited in scope, and, while a new roof element would be added, none of the changes would affect the relationship between the old Main Library building and City Hall, which is the key element unifying the buildings within the local and national historic districts. However, according to the National Park Service and the State Historic Preservation Officer, due to the exterior and interior alterations the building would no longer have the ability to contribute to the significance of the National Historic Landmark District.

URBAN DESIGN (p. 73)

The proposed project would preserve and retain much of the old Main Library exterior. The most notable alteration would be construction of a 16-foot-tall mechanical penthouse / screen that would appear as a new roof element. Other alterations would include installation of new doorways, removal of some windows, and removal of statues above the Larkin Street entrance, and installation of new lion statues near the Larkin Street doorway. Changes in windows and/or window glazing would be discernible from the outside. Addition of the mechanical penthouse likely would be the most noticeable change to the exterior, particularly in views of the principal Larkin and Fulton Street facades. The penthouse would be in the form of a hipped (sloped) roof intended to respond to similarly shaped roofs on other Civic Center buildings, would be visible from Civic Center Plaza and the steps of City Hall to the west, and from the steps of the New Main Library to the south. The form of the penthouse addition would generally be comparable to the scale and massing of surrounding buildings, and therefore the Asian Art Museum project would not have a substantial demonstrable negative physical environmental aesthetic effect; nor would it obstruct scenic views now available to the public.

The potential Phase 2 auditorium/theater addition at 45 Hyde Street and the potential Phase 3 extension of the McAllister Street facade toward Hyde Street would incorporate design elements and materials intended to be compatible with the old Main Library building and would be comparable in scale and massing to surrounding development, and therefore would not have a substantial demonstrable negative aesthetic effect. These additions, subsidiary in visual impact to the old Main Library building, would be required by Planning Code Article 10 to be found compatible with the historic district through the Certificate of Appropriateness process.

SHADOW (p. 75)

The project could potentially generate significant adverse shadow impacts on Civic Center Plaza; this park is under the jurisdiction of the Recreation and Park Department and is subject to the requirements of the sunlight ordinance (Section 295 of the Planning Code). Under procedures implementing Section 295, the Absolute Cumulative Limit for Civic Center Plaza was set at 1 percent additional shadow-foot-hours per year. Qualitative criteria call for preservation of afternoon sun, particularly on seating areas and lawn areas. Since the limit and criteria were adopted, the New Main Library at Larkin and Grove Streets and the Courthouse at Polk and McAllister Street have been constructed, absorbing the allowable 1 percent new shadow on Civic Center Plaza. Therefore, the effective available new shadow limit is zero.

The project would cast new shadow on Civic Center Plaza from March through September in the early morning hours before about 9:00 a.m., when the sun is low on the horizon. After these

hours, the sun would be high enough in the sky such that the penthouse would cause no new shadow. The project would increase total year-round shadow on Civic Center Plaza by approximately 958,718 net new shadow-foot-hours during Section 295 hours. This would represent approximately 0.116 percent (about one-ninth of 1 percent) of the total year-round square-foot-hours of sunlight on Civic Center Plaza, meaning that shadow on Civic Center Plaza would have increased by 1.116 percent, compared to the Section 295 baseline, which is greater than the 1 percent absolute cumulative limit. The additional shadow due to the project would not be expected to interfere with use of the Plaza; nor would it conflict with qualitative criteria adopted by the Planning Commission and Recreation and Park Commission that call for preservation of afternoon sun. However, new shadow from the Asian Art Museum project would exceed the Absolute Cumulative Limit for Civic Center Plaza, which would require either the two commissions to find the new shadow to be *de minimus* (that is, so minimal as to not be significant), or to increase the Absolute Cumulative Limit. Because the project would cast some new shadow on the plaza and because no new shadow is allowable under the Absolute Cumulative Limit for this open space, the project impact is considered significant.

TRANSPORTATION (p. 77)

Based on assumed peak-day attendance (that is, a “blockbuster” exhibition), the Asian Art museum would generate a total of about 675 person trips in the p.m. peak hour, including about 145 p.m. peak-hour vehicle trips, about 175 MUNI and BART transit trips, about 265 pedestrian trips, and about 40 trips by other modes, including regional transit (SamTrans, Golden Gate Transit), bicycle and motorcycle; about 50 additional persons would be carpool passengers. Total p.m. peak-hour vehicle trips generated by the New Main Library and the Asian Art Museum were shown in the Main Library/Asian Art Museum FEIR to result in acceptable intersection operations in the p.m. peak hour at all but one of the intersections studied in the local area. The intersection of Ninth and Market Streets was forecast to operate at LOS E (poor; intersection at capacity), under both existing and with-project conditions, although there would be no change in intersection level of service due to the project. Subsequent analyses have generally confirmed the findings of the *FEIR*, that intersections would continue operate at acceptable levels of service by 2000 with the assumed addition of traffic from several projects in the Civic Center, including the Asian Art Museum project. Effects on transit, pedestrians, and parking, and construction-related transportation effects would also be as reported in the Main Library/Asian Art Museum FEIR and the 1996 EIR Addendum. Therefore, no further analysis is required beyond that included in the Main Library/Asian Art Museum FEIR, updated in the 1996 EIR Addendum.

AIR QUALITY (p. 81)

The Main Library/Asian Art Museum FEIR found that daily transportation-related emissions from the two project components (New Main Library and Asian Art Museum) would not exceed Bay Area Air Quality Management District (BAAQMD) thresholds for significance. In 1996, the BAAQMD tightened its standards, lowering significance thresholds for certain criteria air pollutants. Recalculation of projected emissions using current emissions factors for the year

2000 (approximate completion of construction), which are lower than the factors used in the *FEIR*, indicates that the Asian Art Museum project would not exceed the BAAQMD's lower thresholds. Because the *FEIR*, using higher emissions factors, found that intersection carbon monoxide levels would be well within both state and federal standards, it is expected that the current lower emission factors would similarly yield results within the standards. The conclusion of the Main Library/Asian Art Museum *FEIR* therefore remains valid, and no further analysis of air quality impacts is required.

D. MITIGATION MEASURES (p. 84)

Primary measures that would mitigate potentially significant environmental effects are presented below. A full recitation of mitigation measures proposed as part of the project, under consideration or rejected by the project sponsor, and those under the jurisdiction of other agencies is presented beginning on p. 84.

MEASURES PROPOSED AS PART OF THE PROJECT

HISTORIC ARCHITECTURAL RESOURCES

The following measures would reduce but not eliminate significant adverse effects on Historic Architectural Resources.

- The project sponsor has retained the services of a preservation architect, through construction of the Asian Art Museum.
- The Asian Art Museum would ensure that a qualified preservation architect prepares a complete Historic Structure Report regarding the old Main Library building.
- The Asian Art Museum would ensure that, to the maximum extent feasible, existing building components that are proposed for removal and that are determined to be Significant or Very Significant by the Historic Structure Report(s) would be removed and replaced, in interior spaces to be retained as part of the project, under the direction of the preservation architect. To the extent that such materials are damaged, the museum would endeavor to replace them in kind. The museum would include such provisions in contractors' specifications.
- For those Significant or Very Significant features, as determined by the Historic Structure Report(s), to be retained in place, the Asian Art Museum would ensure that, to the maximum extent feasible, features are protected during construction. Should damage be noted during construction, work that could cause such damage would be halted and construction techniques would be re-evaluated to minimize damage. To the extent that such materials are damaged, the museum would endeavor to replace them in kind. The museum would include such provisions in contractors' specifications.
- The Asian Art Museum would work with the San Francisco Art Commission and appropriate city department(s) to find a relocation site for the 14 Piazzoni murals. Consistent with Board of Supervisors' Resolution No. 1144-97, the Asian Art Museum

would remove the Piazzoni murals from the old Main Library prior to the start of major construction, to protect the murals during that time, and would explore options for the relocation and public display of the Piazzoni murals. The Asian Art Museum Foundation has allocated \$250,000 towards restoration of the Piazzoni murals once they are removed.

- The Asian Art Museum would work with the San Francisco Art Commission and appropriate city department(s) to find a relocation site for the two duMond murals. The duMond murals could be placed in temporary storage pending a determination regarding a relocation site.
- The Asian Art Museum would work with the San Francisco Art Commission to find relocation sites for the Lentelli sculptures above the Larkin Street entrance and the bust of Edward Robeson Taylor in the entrance lobby (Room 191).

ARCHAEOLOGY

- The sponsor would retain the services of an archaeologist. The Environmental Review Office (ERO) in consultation with the President of the Landmarks Preservation Advisory Board (LPAB) and the archaeologist would determine whether the archaeologist should instruct all excavation and foundation crews on the project site of the potential for discovery of cultural and historic artifacts, and the procedures to be followed if such artifacts are uncovered.

Given the archival history of the project site, an historical archaeologist would be present during site excavation and would record observations in a permanent log. The ERO would also require cooperation of the project sponsor in assisting such further investigations on site as may be appropriate prior to or during project excavation, even if this results in a delay in excavation activities.

Should archaeological resources be found following commencement of excavation activities, the archaeologist would assess the significance of the find, and immediately report to the ERO and the President of the LPAB. Excavation or construction activities which might damage the discovered cultural resources would be suspended for a maximum of four weeks (cumulatively for all instances where the ERO has required a delay in excavation of construction) to permit inspection, recommendation and retrieval, if appropriate. Upon receiving the advice of the consultants and the LPAB, the ERO would recommend specific action to protect the resources, if necessary.

Following site clearance, an appropriate security program would be implemented to prevent looting. Any discovered cultural artifacts assessed as significant by the archaeologist upon concurrence by the ERO and the President of the LPAB would be placed in an appropriate repository as determined by the ERO. Copies of the reports prepared according to these mitigation measures would be sent to the Northwest Information Center of the California Historical Resources Information System at Sonoma State University along with three copies to the ERO.

TRANSPORTATION

- To minimize the potential for pedestrian-truck conflicts during construction, the project sponsor would post signs at the construction site and advise construction truck drivers of the presence of the Civic Center Tot Lot and playground, across Larkin Street from the project site.
- The Asian Art Museum would provide traffic control personnel on Hyde Street during truck movements to ensure the safety of pedestrians and to minimize transit and automobile traffic disruption. The Museum would install a lighted sign and/or a noise-emitting device at the entrance to its loading dock to alert pedestrians to vehicles exiting the loading area.
- In order to provide for pedestrian safety during the construction period for the Asian Art Museum, the museum's construction manager could ensure that pedestrian walkways are maintained, as determined to be necessary by the Traffic Engineering Division of the Department of Parking and Traffic, during remodeling of the existing library building and construction of the addition to that building. Coordination between the project sponsor, construction contractor and City departments shall also include the development of measures to ensure adequate pedestrian safety during the construction period. Typically, these measures include the placement of flag persons, warning signs, and barriers to control and protect pedestrian and auto traffic from construction vehicles, activity and equipment.

Improvement Measure

- The Asian Art Museum would include secure bicycle parking facilities for employees and would provide employee showers to encourage bicycle commuting. This measure would also reduce emissions of criteria air pollutants, benefiting air quality.

AIR QUALITY

- The project sponsor would require the contractor(s) to sprinkle exterior demolition sites with water during demolition, excavation and construction activity; sprinkle unpaved exterior construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.
- The project sponsor would require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of PM₁₀ and other pollutants, by such means as a prohibition on idling of motors when equipment so not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

Improvement Measure

- The museum would design and implement a trip reduction program to target visitor travel. For example, the museum could offer discount admission upon presentation of a valid transit pass or other proof of transit use payment. The museum could also provide MUNI, BART, Golden Gate Transit, SamTrans, Caltrain, and AC Transit information at its information desk. The museum currently has a program in place at its existing location in Golden Gate Park that incorporates some of the above measures.

NOISE

- If pile driving were included in the project, the project sponsor would consult with the Department of Public Works to determine the time when pile driving would cause the least disturbance to neighboring uses. The project sponsor would require that the construction contractor(s) limit pile driving activity to result in least disturbance to people. This could require a work permit from the Director of Public Works pursuant to San Francisco Noise Ordinance Section 2908, if pile driving during nighttime hours were determined to be less disruptive to neighboring uses.
- If pile driving were included in the project, the project sponsor would require that the project contractor(s) predrill holes (if feasible based on soils) for piles to the maximum feasible depth to minimize noise and vibration from pile driving.
- The project contractor(s) would be required by the project sponsor to use construction equipment with state-of-the-art noise shielding and muffling devices.

GEOLOGY/TOPOGRAPHY/HYDROLOGY

- One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor(s) would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project.

HAZARDS

- The project sponsor would ensure that building surveys have been or are conducted to identify asbestos-containing materials, PCB-containing electrical equipment, lead-based paint, fluorescent light tubes that may contain mercury, and any other potentially hazardous building materials. If necessary to protect public health, construction workers, or the environment, removal, abatement, and disposal of identified hazardous building materials or other hazardous substances would be conducted prior to demolition of existing structures, as required by the Bay Area Air Quality Management District, the California Occupational Safety and Health Administration, and federal, state, and local laws, including Titles 22 and 23 of the California Code of Regulations (Hazardous Materials and Water Quality), Chapter 36 of the San Francisco Building Code (Work Practices for Exterior Lead-Based Paint), and the City's Hazardous Materials Ordinance.

MEASURES UNDER CONSIDERATION BY THE PROJECT SPONSOR

TRANSPORTATION

- The Asian Art Museum could include secure bicycle parking facilities for visitors to encourage bicycle travel. This measure would also reduce emissions of criteria air pollutants, benefiting air quality.

AIR QUALITY

Improvement Measure

- To help induce shifts from vehicles to transit, the Asian Art Museum could institute a Transportation Demand Management Programs for employees. Such programs typically target primarily commute trips, with various educational, assistance and incentives measures to encourage carpooling and vanpooling, and transit use. These measures may be accompanied by such “disincentives” to low-occupant private vehicle use as restricting the amounts and/or location of parking made available to employees, and charging fees for all-day parking. The effectiveness of these programs is variable, but they are most appropriate and effective when there are substantial constraints to vehicular travel, circulation and storage coupled with suitable options such as excellent transit accessibility. San Francisco in general, and its Civic Center in particular, exhibit this combination of factors. The museum could, at a minimum, provide transit information to all staff members and could also subsidize, through provision of Commute Checks or cash rebates, MUNI and other transit passes for employees who regularly use transit to commute.

NOISE

- The project sponsor could require the general contractor(s) to construct barriers around the 45 Hyde Street site and around stationary equipment such as compressors, which would reduce construction noise by as much as five dBA, and to locate stationary equipment in pit areas or excavated areas, as these areas shall serve as noise barriers.

E. ALTERNATIVES TO THE PROPOSED PROJECT

ALTERNATIVE A: NO PROJECT

This alternative would entail no change to the site. The Asian Art Museum would not relocate from Golden Gate Park. Under this alternative, seismic strengthening of the old Main Library building would not occur as planned, because the bond funding was earmarked to convert the old Main Library building for use as the Asian Art Museum. This alternative could entail future reuse of the building by another City department (or, less likely, by a private entity, which could require sale of the building by the city and rezoning).

Under this alternative, effects relative to the Asian Art Museum project described herein and in the Main Library/Asian Art Museum FEIR and the 1996 EIR Addendum would not occur. The environmental characteristics of this alternative would be generally as described in the setting portions of this report and of the Main Library/Asian Art Museum FEIR. This alternative would

preserve the option to develop the project site with a larger or smaller development proposal; the old Main Library building could remain vacant and unused for an indefinite period of time.

ALTERNATIVE B: FULL PRESERVATION ALTERNATIVE

A historic preservation alternative would integrate the museum's program with the old Main Library building such that most significant historic architectural features of the existing building could be maintained. Since the process of integration produces certain design or program conditions that are less than ideal, it is not possible for any alternative to avoid breaching the Secretary of the Interior's *Standards for Rehabilitation* in some particular. However, unlike in the proposed project, in which Museum program dominates, this Full Preservation Alternative would consider the important historic architectural features of the existing building on at least an equal footing with the program requirements.

The Full Preservation Alternative would fill in the north light court at the lower level and first, second, third and fourth floors. (The proposed project design fills in only the lower level and main floor.) The Full Preservation Alternative would also fill in the south light court at the lower level and main and second floors, which is one level more than the proposed project.

The Full Preservation Alternative would include a base isolation system and concrete shear walls to provide seismic strength, as with the project. A new circulation armature that would be constructed within the "notch" in the project block at the 45 Hyde Street site would provide additional shear (lateral) support. In the second floor stair loggia, seismic strengthening would be accomplished without removal of the existing Piazzoni murals and travertine and faux travertine panels that compose the walls.

Exterior changes under the Full Preservation Alternative would be extremely limited. This alternative would avoid putting all the new boilers, chillers, cooling towers, air handlers and ductwork on the roof of the existing building within a new hipped roof penthouse, as would the project; instead, these elements would be located elsewhere in the building or off-site to reduce the impact on the exterior massing of the building. The five Lentelli sculptures on the west (Larkin Street) elevation of the building would be maintained in place, repaired and conserved. New window glazing would minimize changes in external appearance (likely by avoiding translucent white glass).

As for the building's interior, the existing circulation pattern, or parti, would be retained. Exceptionally Significant Interior Spaces, including the Monumental Staircase and the second floor stair loggia (including the Piazzoni murals on three walls), would remain intact. Two existing ornamental stairs in the south wing would also be retained, as would the existing locations of the primary elevators. The elevator lobbies would be retained as well. Also retained would be the Main Entrance Hall, Vestibule, and primary north-south corridor, as they would under the proposed project.

In addition to the above spaces, all other Exceptionally Significant Interior Spaces on the second floor, including the Great Hall and the two large reading rooms, would be retained in their

present configuration. The reading rooms would not be fitted with a new floor level, as in the project. The stacks in the north (McAllister Street) wing of the old Main Library building would be demolished, as with the project. The Full Preservation Alternative would combine the former stacks area with the existing north light court to gain additional floor space. The south light court would be used as interior space at the ground floor, and would remain an open courtyard at the second floor and up.

The ground floor would contain functions that do not require ticketing, including Lobby/Entry; Existing Elevators, Main Stair and Ornamental Stairs; Museum Store, with direct access to the Entry Lobby to encourage visits before or after visiting galleries; Café, Lounge and Kitchen; Resource Center & Classrooms; and Museum Library. On the second floor queuing, ticketing, and access to galleries would occur in the Great Hall, reached via the Monumental Staircase. The Great Hall would thus retain its historic function as a central gathering and dispersal space for building visitors. Visitors would proceed south from the Great Hall into permanent collection galleries in the large reading rooms, and north from the Great Hall to temporary-exhibition galleries. One-way traffic through the temporary-exhibition galleries would end at the west side of the stair loggia, from where a visitor could descend the Monumental Staircase or move into the permanent galleries. One-way traffic through the permanent galleries would be via entry from the Great Hall on the second floor, proceeding clockwise through the monumental reading rooms to the northwest corner of the building. There, visitors would ascend a new stair that would be built in the former stacks to reach the fourth floor (present third floor), proceed through new galleries, and descend another new staircase to return to the Great Hall.

A new third floor would be constructed only within the existing north stacks and existing north light court; this partial third level would be used for administrative offices. The fourth floor would be at the level of the existing third floor, and would contain galleries and office space. As with the proposed project, the Full Preservation Alternative would accommodate a future auditorium/theater addition at the 45 Hyde Street site and future extension of the McAllister Street wing of the old Main Library.

By maintaining most of the Exceptionally Significant Interior Spaces, as designated in Planning Code Article 10, in their existing condition, including the main entrance lobby, vestibule, north-south corridor and elevator lobbies on the main floor and the Monumental Staircase, stair loggia and Piazzoni murals, Great Hall, and two large reading rooms on the second floor, and by rehabilitating other Exceptionally Significant Interior Spaces following seismic upgrading work, the Full Preservation Alternative would avoid substantial adverse effects on the most important historic architectural features of the old Main Library building. Similarly, by not constructing the rooftop mechanical penthouse and screen, maintaining the statues on the Larkin Street facade, and minimizing changes to existing windows, this alternative would reduce adverse effects on historic architectural resources, compared to the proposed project. Although it is not clear that this alternative would be in full compliance the Secretary of the Interior's *Standards for Rehabilitation*, absent a more detailed design, particularly in regard to the building exterior, the Full Preservation Alternative would not adversely affect Exceptionally Significant Interior

Spaces designated in Article 10 of the Planning Code, and therefore would not be anticipated to result in significant adverse effects on historic architectural resources.

Absent construction of the rooftop mechanical penthouse, the Full Preservation Alternative would also avoid a potentially significant effect on increased shadow on Civic Center Plaza. Although no detailed design of the HVAC system under this alternative is available, it is assumed that shadow impacts would be substantially less than with the proposed project, and relatively closer to existing conditions than to conditions with the project. Exterior changes would be somewhat less apparent than with the proposed project, principally because the Full Preservation Alternative would not include the hipped roof mechanical penthouse and screen. Because the program under this alternative would be similar to that with the proposed project, effects related to transportation, air quality, and growth inducement would be similar to those of the project.

The project sponsor has rejected this alternative for the following reasons: Permanent gallery space would be substantially less, compared to the proposed project, which would result in less permanent gallery space than currently exists at the existing Asian Art Museum in Golden Gate Park. Gallery space on the fourth floor would have a floor-to-ceiling height of only 8'6" (assuming installation of the same HVAC duct system as currently proposed), which would preclude the placement of any tall exhibit pieces. This relatively low ceiling height would contrast with the approximately 30-foot ceiling height in the second floor permanent galleries under this alternative (with no installation of a new third floor level in the second floor reading rooms). Temporary gallery space on the second floor would also be substantially less than would be provided with the project as proposed. Use of the Great Hall under this alternative would eliminate the program requirement for overflow "blockbuster" exhibit space and revenue-producing events. The Great Hall could not be used as a lecture hall. This alternative would meet almost none of the project sponsor's objectives of transforming "dark, static areas . . . into dynamic, light filled spaces full of movement," and would not meet circulation or orientation objectives of the sponsor. In summary, the project sponsor believes that this alternative is not suitable for consideration from functional and funding viewpoints.

ALTERNATIVE C: REDUCED IMPACT ON HISTORIC ARCHITECTURAL RESOURCES

This alternative would be the seismic upgrade and adaptive reuse of the old Main Library building for the Asian Art Museum, with reduced impacts on the historic resource. It would include some of the interior changes proposed with the project, but would avoid substantial alterations to most of the Exceptionally Significant Interior Spaces designated in Article 10 of the Planning Code. Specifically, this alternative would retain intact the second floor stair loggia, including the Piazzoni murals. Rather than a new floor level as proposed with the project, this alternative would install a true mezzanine and/or self-contained two-story structure within the second floor reading rooms. Other Exceptionally Significant Interior Spaces would be retained, as they would with the proposed project, including the Main Entrance Lobby and Vestibule; the Monumental Staircase; and the Great Hall. Exceptionally Significant Interior Spaces on the ground floor that would be demolished or substantially altered with this alternative would

include the two elevator lobbies and the primary north-south corridor. To gain space lost, compared to the project, by the reduced changes to the two-story second floor rooms, this alternative would construct three additional stories above the lower level extension at 45 Hyde Street, the same building envelope as proposed in Phase 2 of the project. A mechanical penthouse would be constructed to hide rooftop heating, ventilation, air conditioning and other equipment, as with the proposed project. Base isolation and concrete shear walls would be constructed, similar to the seismic upgrade program with the project.

Under this alternative, the project would include a modified version of the proposed Central Court, which would serve many of the same functions as with the project as proposed. As with the project, the modified Central Court would provide a gathering space and queuing for ticket purchasing. Unlike the project's three-story Central Court, the modified Court would be a two-story space, with a solid ceiling, rather than skylights. The north wall of the south reading room, including arched windows at the second level, would be retained intact. The south wall of the building's McAllister Street wing would be removed to open up the Central Court, as with the proposed project. There would be no changes in wall openings to the modified Central Court at the second story, compared to the project, which would eliminate the two-story arched windows at the second level. Under this alternative, the proposed glass-enclosed stairway or escalators would not be built. New elevators and a new staircase would be constructed in the southeast corner of the Central Court to transport patrons to the permanent galleries in the second floor of the old Main Library building and second and third stories of the 45 Hyde Street addition.

On the second floor, galleries would be constructed, as with the proposed project, but there would be no new full floor level added in the two primary and three smaller reading rooms. Instead, small mezzanines would be constructed or separate self-contained structures would be inserted into these spaces to display objects. No new openings would be cut into the exterior walls of the south reading room or of the stair loggia and, as noted, the Piazzoni murals would remain. The existing third floor would be remodeled, as with the project.

Effects on historic architectural resources would be less substantial than with the proposed project, because this alternative would include fewer changes to the Exceptionally Significant Interior Spaces designated in the Planning Code. Notably, and in contrast to the proposed project, this alternative would retain the second floor stair loggia walls that support the Piazzoni murals in Room 290, and would not install a new full floor level in the second floor reading rooms; mezzanines and/or self-contained structures within these double-height spaces would have less effect on a viewer's perception of these monumental spaces than the full floor level, and could be removed in the future relatively easily. This alternative would not fully comply with the Secretary of the Interior's *Standards for Rehabilitation*. Shadow impacts are assumed to be similar to those of the proposed project, as this alternative assumes construction of a comparable rooftop mechanical penthouse and envelope at 45 Hyde Street. Because museum program under this alternative would be fundamentally the same as with the proposed project, effects related to transportation, air quality, and growth inducement would be similar to those of the project.

The project sponsor believes that this alternative would result in internal circulation problems, including discontinuities in floor heights; would not accomplish the program objective of relating the path of travel to the origin and spread of Buddhism in that Buddhism is a common thread throughout Asia; would preclude future expansion that is necessary for the long term viability of the museum; and would not meet the program's architectural objectives.

CHAPTER II

PROJECT DESCRIPTION

A. PROJECT SPONSOR'S OBJECTIVES

The Asian Art Museum seeks to expand the space available to display and care for the museum's permanent collection, as well as to develop gallery space for temporary exhibits, which currently require that art in the museum's permanent collection be temporarily removed from display. The Commission also seeks to relocate to the old Main Library building to create a separate identity for the Asian Art Museum, currently located within the M.H. deYoung Museum building in Golden Gate Park.

Special exhibitions (not involving a museum's permanent collection) are a major activity that draws visitors to most museums (Sano, 1998). Therefore, among the Asian Art Museum's primary objectives in this project is to gain gallery space to allow for presentation of traveling and other temporary exhibitions without having to remove large portions of its permanent collection from display. At the existing museum in Golden Gate Park, the Asian Art Museum has no dedicated gallery space for display of non-permanent items. Total existing gallery space is approximately 28,000 sq. ft. The project would provide about 8,000 sq. ft. of gallery space for temporary exhibitions, with an additional 3,500 sq. ft. of temporary display space available in a shared gallery / event room / temporary auditorium. Gallery space devoted to the permanent collection would increase by about 1,000 sq. ft., to 29,000 sq. ft., and total gallery space, by about 9,000 sq. ft., to 37,000 sq. ft.

Subject to when funding becomes available, under a second phase of the project, analyzed herein the museum also seeks to provide permanent space for performances, lectures and the like to rectify an absence of such space in the Golden Gate Park location. Finally, in a third phase also analyzed in this SEIR, the museum seeks to provide for further expansion by construction of an extension to the old Main Library building's north wing on McAllister Street to Hyde Street. The museum considers this future expansion critical to its long-term operational needs, as the museum's collection is expected to continue to grow.

The Asian Art Museum also seeks to add space for educational activities. At present, the museum has one combination classroom, board room, and meeting room. The museum is also in need of additional art storage and art conservation and restoration space, all of which the museum believes are very limited at the Golden Gate Park site.

In its 1996 Master Plan (Lord, 1996), the Asian Art Museum identifies five goals:

- Open the New Asian in the Civic Center by the end of 2000;

- Expand relationships with Asian-American communities;
- Increase awareness of and support for the New Asian among all public and private sectors;
- Make the New Asian user-friendly and responsive to its visitors' interests and needs; and
- Develop economic and cultural exchanges within the Pacific Rim.

The Master Plan for the museum states that the following goals, taken together, indicate the broad mandate of the New Asian Art Museum:

“LOCAL: Located in the Civic Center, the New Asian will be more closely connected with the City in the public mind and will be accessible to the entire Bay Area. By renewing and extending relationships with Asian communities, the Museum will be serving the local community.

“STATE: As the Asian Art Museum in California, the state with the largest population of Asian Americans, the New Asian could play a leadership role in providing educational materials and art programs to schools throughout the state through print materials, small traveling exhibitions and new communication technologies. [Sponsor's emphasis]

“NATIONAL: The Asian Art Museum of San Francisco is the first one in the United States devoted exclusively to the Arts of Asia, and it remains one of the most important collections in the country. Its national role includes the circulation and hosting of major exhibitions, scholarship and research. Consideration should be given to expanding the national role of the New Asian to include leadership in education – particularly in creating awareness and appreciation for the diversity of Asian art and culture among Asians and others.”

“INTERNATIONAL: The museum plays an active role internationally in circulating and hosting exhibitions, in providing technical expertise in conservation and seismic mitigation, and in scholarship and research. As trade and cultural exchange expands between Asia and America, the New Asian has the opportunity to expand its international role to become a meeting place between East and West. New Direction objectives include the establishment of a corporate membership program to facilitate this type of ‘meeting place.’ An international membership program might also be appropriate” (Lord, 1996, pp. 8-9).

The Asian Art Museum has selected as the project adaptive reuse of the old Main Library building in the San Francisco Civic Center. The museum believes that the rehabilitation and adaptive reuse of the former library would leave its Beaux Arts exterior essentially unchanged, and that the design would retain historically significant architectural spaces and details of the interior: the entrance, grand staircase, loggia and great hall, vaulted ceilings, travertine and faux travertine finishes, skylights, inscriptions, molded pilasters, significant light fixtures and stone floors. The sponsor believes the design for the adaptive reuse of the old Main Library as the new Asian Art Museum would meet the challenge of creating an inspirational showplace for an

unparalleled collection of precious art, while preserving the integrity of a building that is a contributing component of the Civic Center's classical Beaux Arts design (Asian Art Museum, 1997).

According to the design architect, the proposed alterations to the old Main Library building are necessary to accommodate the Asian Art Museum and reflect the change in the building's function. "It transforms dark, static areas that suited the library requirement into dynamic, light filled spaces full of movement that are the function of a museum. . . . It provides a sky-lighted piazza that wraps around the grand staircase by providing public access to the teaching areas, cafe, and [museum] store, thus preserving the area but giving it much needed light, a sense of place and free public amenities. The circulation pattern is kept simple so at all times the patrons clearly understand where they are located in any area of the museum, without having to resort to a map" (Aulenti, 1997).

A key objective of the proposed circulation pattern is to relate the path of travel through the old Main Library building to the origin and spread of Buddhism (both geographically and chronologically) in that Buddhism is a common thread throughout Asia and Asian Art.

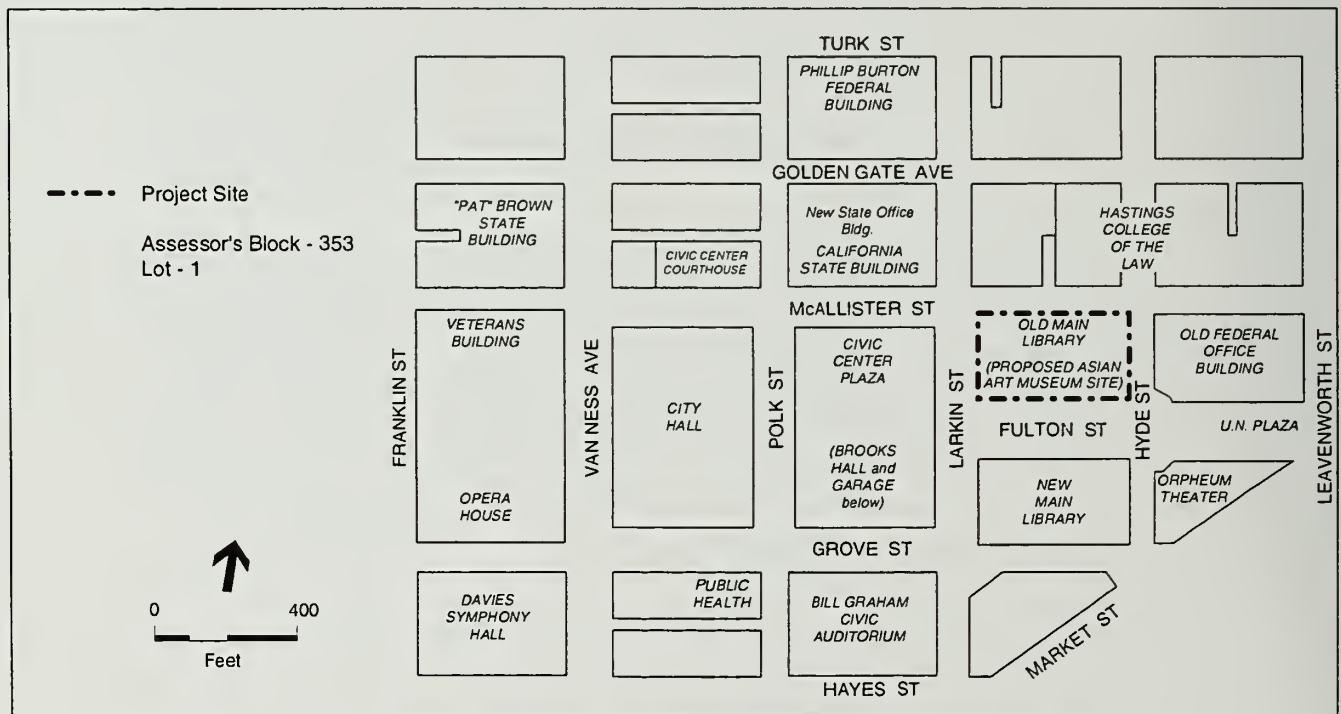
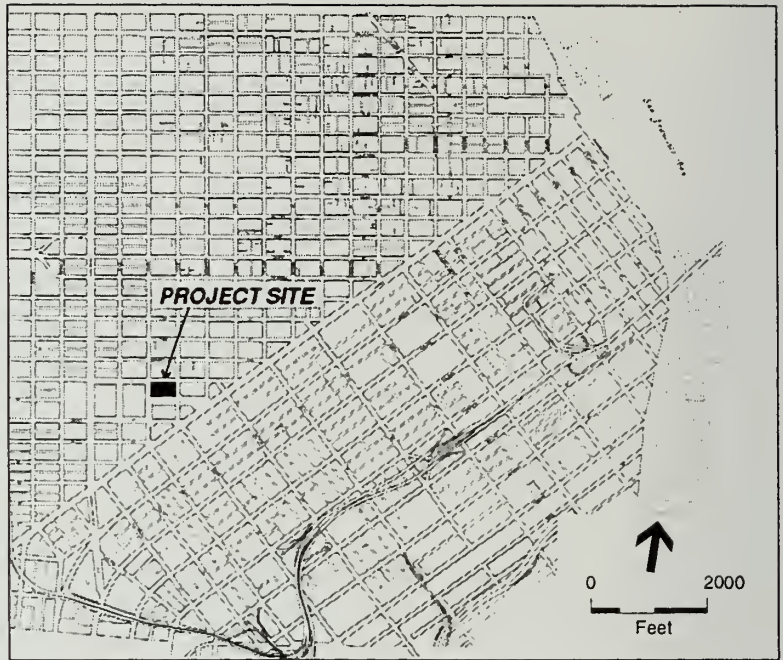
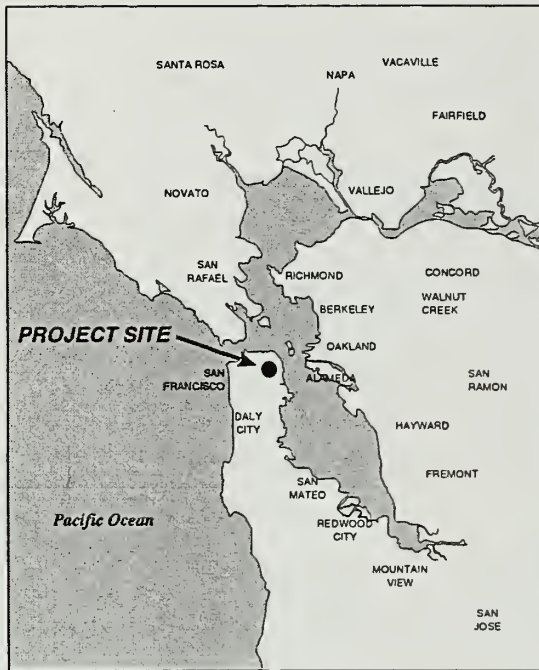
In seismically upgrading the old Main Library building, the Asian Art Museum seeks to achieve a high level of protection for its collection: no loss of collection value in a Richter Magnitude 7.0 earthquake, and loss of less than one percent of the displayed collection value and no loss of collection value in art storage in a Magnitude 8.3 earthquake.

B. SITE LOCATION AND PROJECT CHARACTERISTICS

SITE LOCATION

The project site, located in the San Francisco Civic Center, occupies the entire block bounded by Larkin, McAllister, Hyde, and Fulton Streets, and consists of Lot 1 in Assessor's Block 353 (see Figure 1). The approximately 90,000-sq.-ft. site contains the old Main Library building, now unoccupied, and a vacant site formerly the location of a three-story city office / library annex building at 45 Hyde Street, demolished in November 1997. The project site is in a P (Public) use district and an 80-X Height and Bulk District. The site is within the local Civic Center Historic District, designated under Article 10 of the San Francisco Planning Code, as well as in a Historic District and a National Historic Landmark District, both listed on the National Register of Historic Places.¹

¹ Both federal designations recognize the importance of a group of historic buildings; the National Historic Landmark District is a more selective designation and applies to fewer properties nationwide. Neither designation is regulatory except in the case of granting of federal tax credits for preservation projects (not proposed for this project). For federally funded projects, listing on the National Register requires that the federal agency granting approval or funding must consider effects of the project on historic resources. No federal funding is included in the Asian Art Museum project.



SOURCE: Environmental Science Associates

97.750E Asian Art Museum / ESA 970-119 ■

Figure 1
Project Location

PREVIOUSLY ANALYZED PROJECT

As described in the Main Library/Asian Art Museum FEIR, remodeling and expansion of the old Main Library building to accommodate the Asian Art Museum – under a development program similar to that currently proposed – is to begin after completion of the new Main Library and relocation of all library services to the new building. With completion of the new Main Library and vacation of the old Main Library building, the Asian Art Museum is thus preparing to seek approvals required for remodeling and converting the old Main Library building to museum use. The Main Library/Asian Art Museum FEIR analyzed the conversion of the old Main Library for the adaptive reuse by the Asian Art Museum. Although the museum's current design proposal was not complete, the Main Library/Asian Art Museum FEIR analyzed a development program basically the same as that currently proposed regarding its main components, and with similar exterior alterations. The interior alterations currently proposed are somewhat different than the interior plan described in the FEIR.

The Main Library/Asian Art Museum FEIR evaluated exterior alterations to the old Main Library building including removing the library name and inscription above the Larkin Street entrance and installing a sign identifying the building as the Asian Art Museum and Chong-Moon Lee Center for Asian Art and Culture; removing the inscribed references to literary figures from the building and of the cement statues above the Larkin Street doorway; installing two new doorways to replace the existing single entrance on the Fulton Street side of the building; and extending ground-level windows along Fulton Street downward to increase interior light. The name change and signage were approved in 1996, and the signage installed in 1998. Removal of the literary inscriptions on the building exterior and lengthening of the Fulton Street windows are no longer proposed. Removal of the statues, installation of new doorways in the Fulton Street facade, and other changes currently proposed, including some not previously analyzed, are described below under Physical Alterations to the old Main Library. Demolition of the 45 Hyde Street building, analyzed in the FEIR, occurred in November 1997.

Interior changes described in the Main Library/Asian Art Museum FEIR included conversion of the General Reference room (also known as the Great Hall) to a reception room and of the west second floor reading room to a gallery; conversion of the library stacks to gallery, office and work space, including a new mezzanine level and, potentially, installation of a mezzanine level in the south reading room on the second floor.² Large canvas murals in both second floor reading rooms and on the walls of the second-floor balcony, or loggia, were to be moved, if feasible, or alternatively, covered in place. Some of these proposed changes remain in the current project, and some have been modified. For example, a new full third floor is now proposed, and all murals would be removed. The project as previously analyzed also included a

² Based on Planning Code and Building Code definitions of mezzanine, this level would have been a partial floor. This new partial floor was identified as part of a development option that would not have included construction at 45 Hyde Street. The FEIR also described an option that would have included construction on the 45 Hyde Street site of an addition to the old Main Library building, containing new gallery space and an auditorium. Under this option, no new floor would have been inserted in the south reading room. The project as currently proposed includes a new third floor as described in this SEIR and construction of an expanded lower level at the 45 Hyde Street and a theater, subject to funding becoming available. Future gallery expansion at that site could proceed, also subject to funding availability.

400-seat auditorium, which would be part of the second phase expansion at the 45 Hyde Street site, subject to available funding (see Expansion Space, p. 43, below). These changes and additional changes from the previously analyzed conceptual scheme are described below.

PROJECT CHARACTERISTICS

The project is adaptive reuse of the old Main Library building by the Asian Art Museum including: seismic upgrade, alterations to the exterior and interior of the building and an underground extension that would be about 12 feet above grade at 45 Hyde Street. (Future phases analyzed include construction of an auditorium/theater with offices above (to about 80 feet) at 45 Hyde Street, and extension of the McAllister wing towards Hyde Street. These two phases are not currently funded.) Main components of the project include 1) seismic upgrade of the old Main Library, 2) exterior alterations including a new mechanical penthouse/roof element about 16 feet tall; removal of cement statues on the Larkin Street facade, new doorways and lengthened windows on the Fulton facade, new door openings on the McAllister and Hyde frontages; construction of seismic moat; an outdoor dining area on Fulton; and enclosure of existing light courts to form an interior Central Court. A loading dock would have access on Hyde Street. 3) Interior alterations would include the following: retention of the Main Entrance Hall and Vestibule and Monumental Grand Staircases, and Great Hall; alteration of the second floor loggia including demolition of non-supporting walls and removal (and relocation) of Piazzoni Murals; addition of a new third floor including inside the south and west reading rooms; demolition of large portions of the ground and existing third floors for adaptive reuse, including creation of a three-story-tall Central Court that would surround the Monumental Staircase; and demolition of seven-story library stacks for use as museum space; conversion of library spaces to galleries, classrooms, research library, offices, museum store and cafe. No parking would be provided.

The proposed project would change the use of the old Main Library building within the existing structure and would expand the existing basement, or lower level, onto a portion of the 45 Hyde Street part of the site, resulting in approximately 180,000 gross square feet (gsf), or about 3 percent more space than was used by the library (174,000 gsf). The 180,000 gsf is about 20 percent less space than the approximately 224,000 gsf described and analyzed for the Asian Art Museum in the Main Library/Asian Art Museum FEIR. Subject to available funding, the project would also include construction of approximately 68,500 gsf of additional space at 45 Hyde Street, which would bring the total program to approximately 248,500 gsf (see Expansion Space, p. 43).

The program would provide about twice the space of the museum's existing 90,000-gsf space in Golden Gate Park. (Because of certain inefficiencies in the reuse of the old Main Library, the increase in net square footage of usable program space from the Golden Gate Park location would be about 65 percent, from 73,000 sq. ft. to 121,500 sq. ft.) Gallery (exhibit) space would increase over that in the existing Museum by more than 25 percent. The principal change regarding gallery space is that the museum would gain space to mount temporary exhibitions without having to store portions of its permanent collection during temporary exhibits, as at

present. That is, the existing Golden Gate Park building does not contain any gallery space dedicated to temporary exhibitions, while the project would provide about 8,000 sq. ft. of such dedicated space, with more than 3,500 sq. ft. of additional temporary exhibition gallery space in the Great Hall. Gallery space devoted to the permanent collection would increase only slightly, however, compared to present conditions – from about 28,000 sq. ft. to about 29,000 sq. ft.

Table 1 details the proposed Museum area by use, in net (usable) square footage. Table 2, p. 27, compares the design as developed to the project analyzed in the Main Library/Asian Art Museum FEIR.

PHYSICAL ALTERATIONS TO THE OLD MAIN LIBRARY

The project would seismically strengthen and remodel the old Main Library building to accommodate gallery, office, conservation, research, education, retail, and storage space for the Asian Art Museum, which is currently located in Golden Gate Park. The project would include exterior and interior alterations to the old Main Library building, which is a Contributory building within the local Civic Center Historic District under Article 10 of the San Francisco Planning Code, and within a Historic District and a National Historic Landmark District, both listed on the National Register of Historic Places.

Seismic Upgrade

According to a study of the old Main Library's structural condition, the seismic strengthening program must address ten key areas of the building, five structural and five non-structural (Rutherford & Chekene, 1992). Structural concerns are:

- 1) The unreinforced masonry walls between the building's steel frame members provide inadequate resistance against lateral (shear) forces that could result from an earthquake.
- 2) The north wing (former library stacks), essentially one 56-foot-tall room, in particular, is lacking structural bracing and the north wall is relatively weak. (Some repairs were undertaken in this area following the 1989 Loma Prieta earthquake, which damaged the stacks.)
- 3) Concrete floor and ceiling diaphragms are inadequately reinforced and not well connected to the walls.
- 4) The two central interior light courts, on either side of the Monumental Staircase, diminish the lateral strength provided by floors and roof.
- 5) The foundation footings are inadequately tied together to adequately resist seismic loads.

TABLE 1
PROJECT CHARACTERISTICS (NET SQUARE FEET)

Proposed Uses	Current Project NSF^{a,b}	Potential Expansion Space (45 Hyde) NSF^{a,b,c}	Total
Galleries	37,500	15,000	52,500
Public Areas ^d	21,500		21,500
Service ^e	16,000	9,000	25,000
Art Storage	15,000		15,000
Administration	10,300	16,500	26,800
Library	4,500		4,500
Education	3,200		3,200
Conservation/Photography	5,300		5,300
Retail	3,000		3,000
Cafe	5,200		5,200
Auditorium/Theater (≈400 seats)	—	<u>14,500</u>	<u>14,500</u>
TOTAL	121,500	55,000	176,500
Parking Spaces	0		
Loading Spaces	2 van plus 1 semi-trailer truck		

^a Net Square Feet, exclusive of exterior walls, stairs and elevators, hallways, and mechanical and electrical service space

^b Approval actions will consider the project expressed in gross square feet, rather than net square feet, and therefore square footage figures may be expected to vary somewhat from those herein. However, the minor differences would not affect the analysis of impacts in this SEIR.

^c Other than the proposed auditorium/theater, the potential expansion space program at 45 Hyde Street (project phases 2 and 3) is diagrammatic, and no formal design work has proceeded.

^d Great Hall, Monumental Grand Staircase, Second Floor Loggia, Central Court, Lobby. As noted in text, Great Hall (3,500 sq. ft.) would serve as special gallery space and a temporary auditorium.

^e Workshops, Shipping, Equipment Rooms

SOURCE: Hellmuth, Obata & Kassabaum, Inc.; LDA Architects, Inc.; Robert B. Wong, AIA, Architects/Planners; in association with Dott. Arch. Gae Aulenti, FAIA

TABLE 2
COMPARISON OF FEIR PROJECT WITH CURRENT, MORE DETAILED DESIGN

Principal Feature	FEIR Project	Current Project
Exterior Features		
Rooftop mechanical equipment	Not discussed	16-ft. hipped roof penthouse/screen on Larkin; 7-ft. hipped roof screen on Fulton, McAllister
Library identifying inscription	Replace with Asian Art Museum sign	Replace with Asian Art Museum sign (completed 1998)
Larkin Street doors	Retain	Retain
Larkin Street second floor windows	Retain	Retain; install translucent glass behind windows
Statues over Larkin Street entrance	Remove	Remove
Fulton Street ground floor facade	Replace existing entry with two entries	Retain but do not use existing entry; install 5 new entries in place of existing windows
Fulton Street ground floor windows	Lengthen windows	Retain (except as noted above)
Fulton Street second floor windows	Retain	Retain; install translucent glass behind windows
Literary inscriptions	Remove	Retain
45 Hyde Street addition	80 feet tall; full site	80 feet tall, partial site; future expansion potential to full site.
45 Hyde Street lower level	Not discussed	Extension of old Main Library lower level
Interior Features		
Second Floor Reading Rooms (201, 202, 203, 210, 218)	Potential addition of new partial floor / mezzanine in 210 (so. reading rm.)	Add new full floor, with 5-ft. setbacks from outer walls in 201 & 210 (west & south reading rms.); create new openings in north wall of 210; demolish east wall of 201 at no. & so. ends
Entrance Vestibule (191)	Retain	Retain
Entrance Hall (101)	Retain	Retain
Corridor (190)	Retain	Retain
Monumental Staircase (S101)	Retain	Retain; alter flanking 2nd floor loggia
Great Hall (200)	Retain	Retain; elevator would protrude into room
Main Stair Hall [Loggia] (290)	Retain	Demolish wall panels containing Piazzoni murals, remove murals; retain columns, base and entablature; add new columns; retain inner columns, floor, and ceiling; demolish east wall
Piazzoni murals (in 290)	Remove or cover in place	Remove, relocate outside project
Elevator Lobbies (192, 193)	Not discussed (retain)	Demolish
Fulton Lobby, Vestibule (198A, 198)	Demolish; relocate entry	Close door; convert to cafe dining room
Corridor (190B)	Not discussed (retain)	Demolish most; incorporate in Central Court
Corridor (190A)	Not discussed (retain)	Demolish most; incorporate in Central Court
Corridor (194)	Not discussed (demolish)	Demolish
Light Courts	Convert to galleries	Convert to Central Court
Stacks	Construct new floors; convert to galleries	Construct new floors; convert to galleries
Children's Room and Office (114, 116)	Not discussed (demolish)	Demolish
Fine Arts Dep't. and Office (118, 118B)	Not discus. (poss. demo.)	Demolish
Lurie Room (102)	Retain; conv. to other uses	Retain and divide for other uses
Staff Room (103)	Retain; conv. to other uses	Retain; convert to gallery
Corridor (291A)	Retain	Retain
Corridors (291B, 291C)	Retain	Demolish; incorporate into 201
Periodical Room (301)	Not disc.; conv. to library	Convert to library

NOTE: Numbers in parentheses refer to room numbers in old Main Library; 100 series indicates first floor, etc.; see figures in Appendix A.

SOURCE: Environmental Science Associates; Hellmuth, Obata & Kassabaum, Inc.; LDA Architects, Inc.; Robert B. Wong, AIA, Architects/Planners; in association with Dott. Arch. Gae Aulenti, FAIA

Non-structural deficiencies noted are:

- 1) Concrete fireproofing around some of the structural steel is not well reinforced and could pose a falling hazard to building occupants and contents.
- 2) The exterior stone veneer and parapet require additional anchoring to the structure.
- 3) The exterior brick (glazed clay masonry) veneer walls in the interior light courts and at the building's east facade are apparently not anchored to the structure.
- 4) The interior plaster ceilings throughout the building lack lateral bracing and could fall in a large earthquake.
- 5) Similarly, interior plaster walls, including those supporting the duMond and Piazzoni murals, lack appropriate structural support and could fall in a large earthquake.

Seismic strengthening would be accomplished by a base isolation foundation system and concrete shear walls. The base isolation system would be founded on strengthened and connected footings. Its foundation system would include approximately 200 isolators, which act like horizontal shock absorbers in an earthquake, allowing the building to move somewhat independently of ground motion. Base isolation would require excavation of a moat approximately two-and-one-half feet wide around the entire building to allow for this movement. A new basement floor slab would be poured above the foundation. The flooring of the lower level (basement) would be reconstructed about two to three feet above the existing floor level to accommodate the installation of the base isolation system below.

Shear walls, which would be constructed essentially as concrete tubes at the four corners of the building and at the Great Hall, would provide additional lateral (shear) strength against horizontal forces. The shear walls would be constructed inside the existing exterior walls, which, to avoid affecting these outside walls, would necessitate removing interior walls, except at the Great Hall, where the shear walls would be constructed around the outside, within the existing interior light courts and at the eastern exterior facade, to preserve the Great Hall's interior plaster and other finish materials. New interior walls would be constructed over the other shear walls. New floors would be installed and existing floors strengthened.

Unreinforced masonry (brick) walls in the two interior light courts and on the east facade would be replaced, with a stucco-like finish for those that would remain exterior walls and with a waxed plaster finish for newly created interior walls. The new finish materials would be lighter than the existing brick, resulting in less load on the structure and the foundation.

Because of the delicate nature of much of the museum's collection, the structural upgrade would be designed to exceed current code seismic performance goals of protecting the life safety of building occupants, compared to building occupants. Performance goals include no loss of total collection value in an earthquake of Richter Magnitude 7 with an epicenter within 11 miles, and loss of less than one percent of the displayed collection value and no loss of collection value in

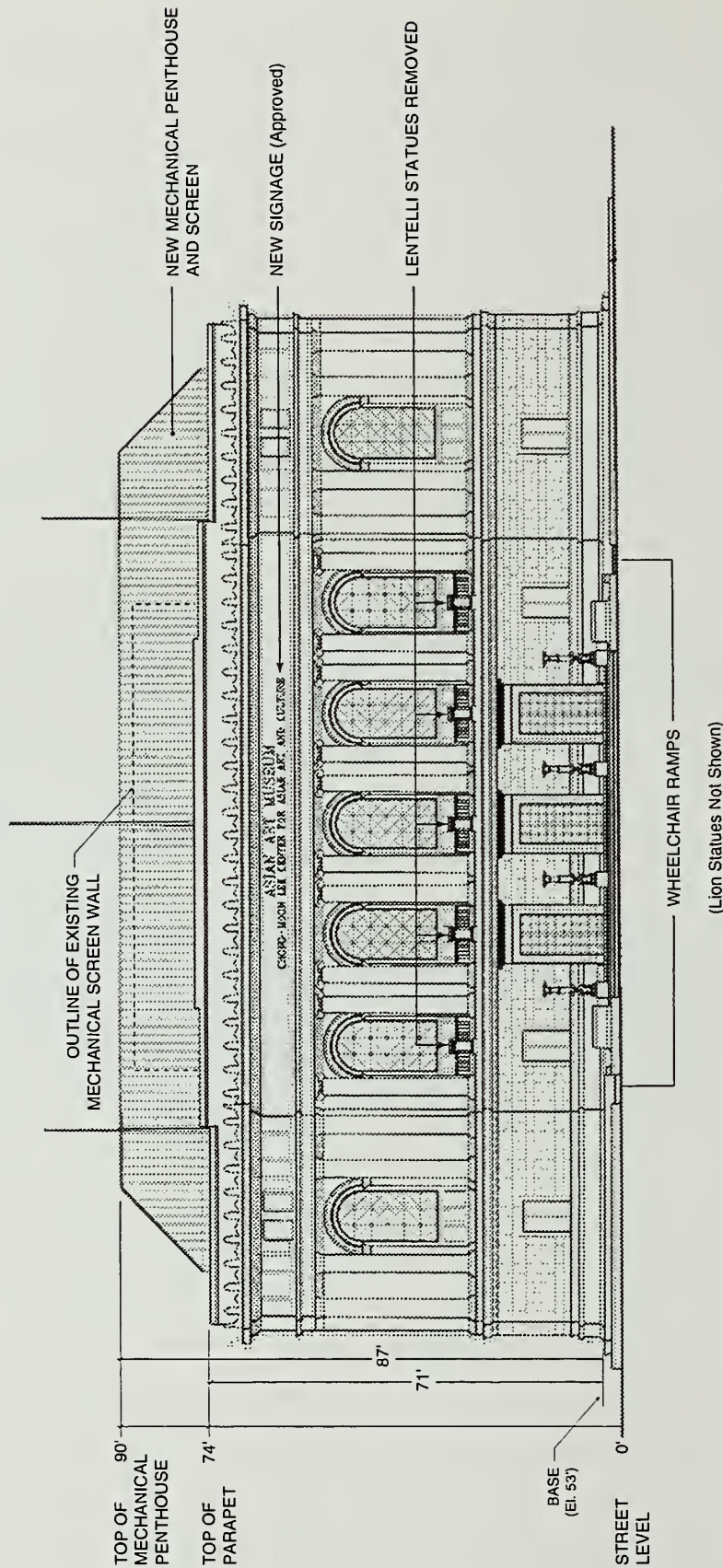
art storage in an earthquake of Richter magnitude 8.3, representative of a repeat of the 1906 San Francisco earthquake.

Exterior Alterations

Figures 2 through 5, pp. 30 through 33, show project elevations. Principal exterior alterations would include the following:

- removal of the five cement statues above the Larkin Street doorway, representing Art, Literature, Philosophy, Science, and Law;
- installation of two Chinese lions, currently outside the existing Asian Art Museum in Golden Gate Park, on new granite pedestals at the Larkin Street entrance. The existing granite pedestals at the sidewalk on either side of the Larkin Street steps would remain, but the lions would likely be installed closer to the building;
- modification of the existing Larkin Street entry stairs and wheelchair ramp to accommodate and cover the seismic moat and to conform to current disabled accessibility requirements, including the Americans with Disabilities Act (ADA).³ All three Larkin Street doors would remain. It is likely that the all three Larkin Street doors would be used by the museum. (The library most recently used the center and right-hand doors and the left-hand door was closed.);
- possible installation of sculpture in grass-covered areas in front of the building's Larkin Street facade;
- installation of four new doorways on the south (Fulton Street) side of the building, including one to serve an outdoor dining terrace at the museum cafe, one at a proposed donor/member lounge at the east end, and two code-required emergency exits; a new doorway at the east (Hyde Street) end of the building, leading from the lounge to a new outdoor Classic Chinese Garden; and two required emergency exits in the north (McAllister Street) wing of the building. The existing Fulton Street door would be fixed shut;
- modification of the south (Fulton Street) stairs to the building for construction of a new dining terrace, and the seismic moat and cover. There would be no museum access from Fulton Street;
- installation of new rooftop heating, ventilation, air conditioning (HVAC) and other mechanical equipment and construction of a 16-foot-tall hipped-roof (sloped) penthouse / screen above the Larkin Street facade and a 7-foot hipped roof screen above the Fulton and McAllister Street facades to shield this equipment from street level views.

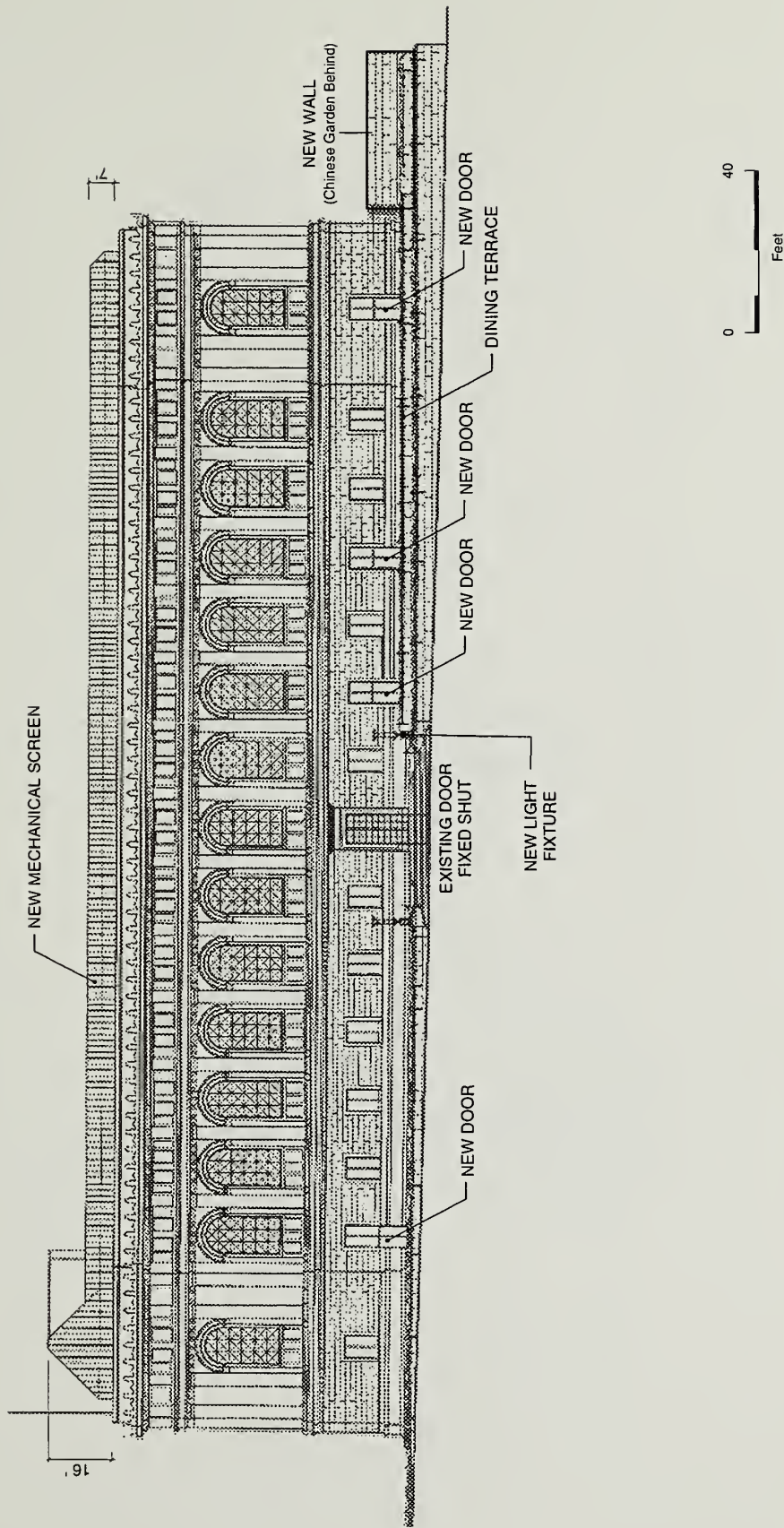
³ The program includes base isolation of the entire structure as part of the seismic upgrade. See p. 25 for additional information.



97.750E Asian Art Museum / ESA 970419 ■

Figure 2
Proposed Larkin Street Elevation

SOURCE: HOK / LDA / RWA

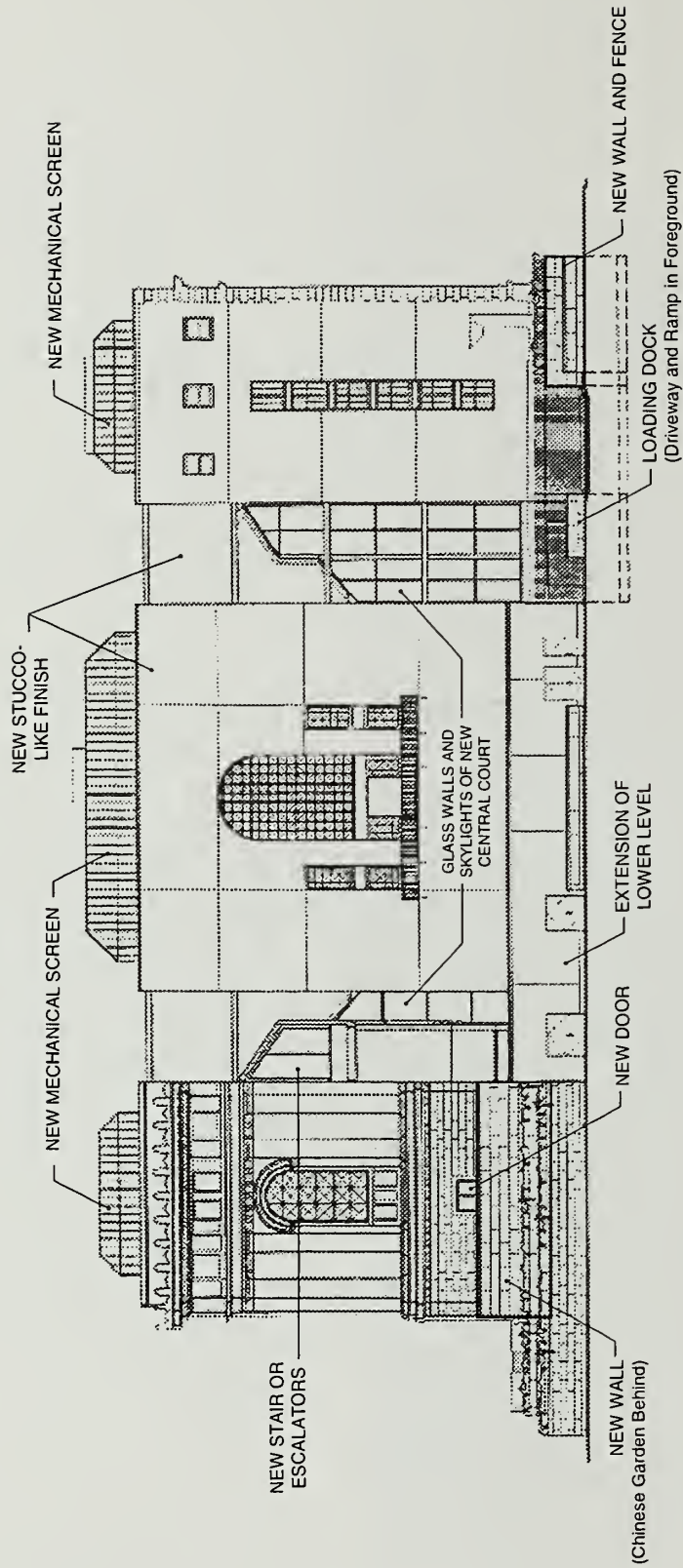


SOURCE: HOK / LDA / RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 3 (Revised) •

Proposed Fulton Street Elevation

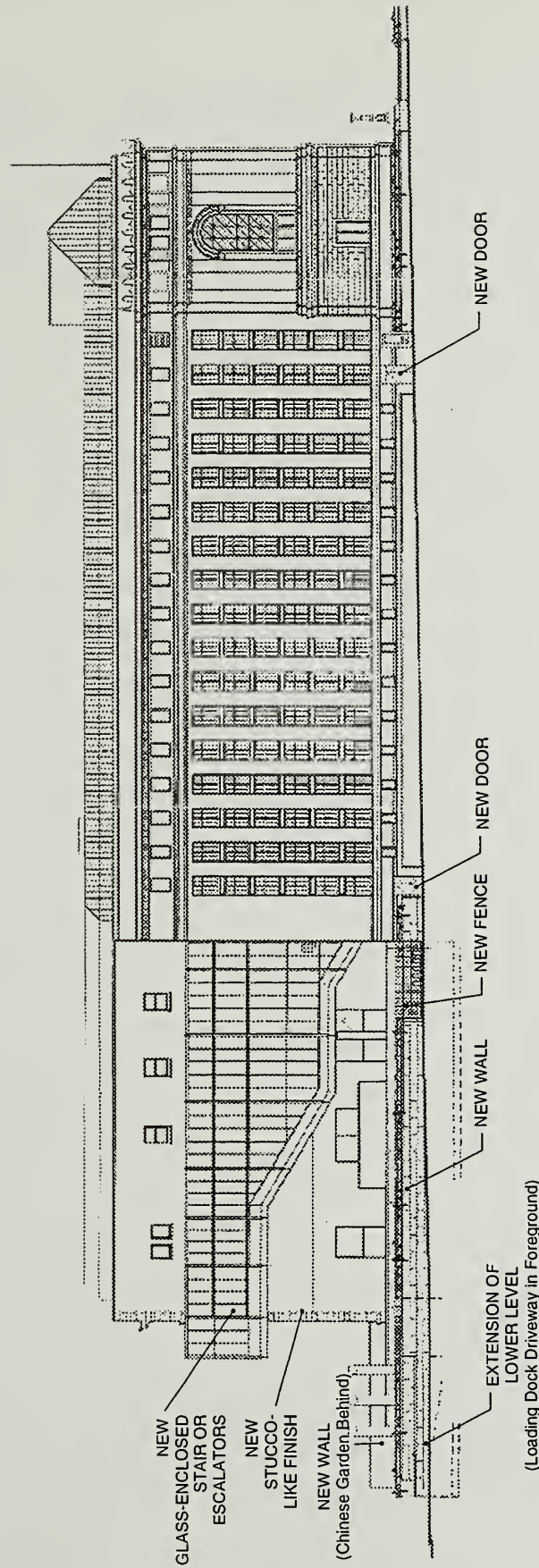


SOURCE: HOK / LDA / RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 4 (Revised) •

Proposed Hyde Street Elevation



97.750E Asian Art Museum / ESA 970419 ■
Figure 5 (Revised) •
 Proposed McAllister Street Elevation

SOURCE: HOK / LDA / RWA

The new mechanical equipment is proposed due to conditioning requirements of the Asian Art Museum, which are more stringent than those of the library. Although the top of the mechanical penthouse would be set back approximately 20 feet from the existing cornice, and there would be no change in the height of the existing cornice line, the mechanical penthouse would increase the apparent height of the building's Larkin Street facade, as viewed from across Larkin Street for example, to approximately 90 feet above street elevation, from the existing approximately 74 feet (top of the parapet), since the penthouse would be visible from ground level except from the sidewalk immediately in front of the building (see Figure 2, p. 30).⁴ (Height to the top of the penthouse would be 87 feet above the concrete plinth, or base, on which the building sits.) The penthouse and screen would be within the 16 feet allowable for a mechanical appurtenance, under Planning Code Section 260(b)(1)(A), and thus exempt from the 80-foot height limit. Therefore, the project would not result in a change in building height under the Planning Code;

- removal of existing unreinforced glazed clay masonry (brick) in the existing interior light courts and on the building's eastern elevation and replacement with a stucco-like exterior finish (for exterior elements) and a plaster finish (for new interior elements);
- enclosure of the existing light courts⁵, including creation of large openings in existing exterior walls that would open onto the newly created indoor space. Existing windows in the side walls of the light courts would be removed, including the north wall of the Fulton wing with large arched windows at the second floor. Glass walls would be installed in the building's east facade, on either side of the Great Hall (former library General Reference room). This proposed new Central Court, which would become the principal reception area within the museum, is described further below under Interior Alterations; and
- expansion of the existing basement, or lower level, onto part of the 45 Hyde Street portion of the site to accommodate mechanical, storage, and art conservation space. Because the site slopes down to the east, this addition would be approximately 12 feet above grade at the eastern (Hyde Street) property line. Subject to funding, in the future the 45 Hyde Street site would also contain an auditorium/theater and two stories of museum office space, in an addition that would align with the height of the old Main Library building (about 80 feet above grade on Hyde Street);

The two-story arched windows on the principal Larkin and Fulton Street sides of the building and the Hyde Street end of the south wing would be retained and reglazed with clear insulated glass that would control temperature and inhibit ultraviolet light. New windows with translucent white glass would be installed inside of the existing windows. Unlike existing conditions, the

⁴ The old Main Library building has an existing rooftop mechanical screen wall 13 feet tall that is set back more than 50 feet from the cornice and that extends across about one-half of the building's width. Because of its setback, this existing screen wall is not a prominent visual feature. (Figure 2, p. 30 of this report, shows the new penthouse. The top photo in Figure 12, p. 59 of the Main Library/Asian Art Museum FEIR, reproduced as Figure A-1 in Appendix A herein, shows the existing Larkin Street facade; note that the existing mechanical penthouse is not visible.)

⁵ These existing light courts are enclosed within the building's walls and open to the sky.

two-story windows would no longer be operable. The existing exterior cast iron clathri lattice work would be re-attached to the reglazed windows. Shades would allow the control of daylight into the galleries. On the McAllister Street facade, existing clear glass would be largely replaced with a gray-green spandrel (opaque) glass to conceal new structural beams, gallery space, mechanical spaces, and elevator shaft equipment, part of the conversion of the north wing from library stacks to museum program space.

Most existing rooftop skylights would be eliminated. A new roof, with new heating, ventilation, and air conditioning units above, would replace them. The skylights over the existing stair loggia would be retained.

A loading dock would be constructed at the lower level of the old Main Library, with access to and from Hyde Street via a new ramp. Excavation would be required to a depth of about 6.5 feet at Hyde Street; a total of about 3,245 cubic yards would be removed. The project would provide two van spaces and one space for large semi-trailer trucks. The existing lower level would house storage and conservation spaces. Bicycle parking (about 10 spaces) and motorcycle parking (about 12 spaces) would be provided in this same area, also accessed from Hyde Street.

In 1998, the inscription identifying the building as the San Francisco Public Library was covered over with signage identifying the building as the Asian Art Museum and as the Chong-Moon Lee Center for Asian Art and Culture. This action was granted the required Certificate of Appropriateness by the Planning Department in 1996.

Interior Alterations

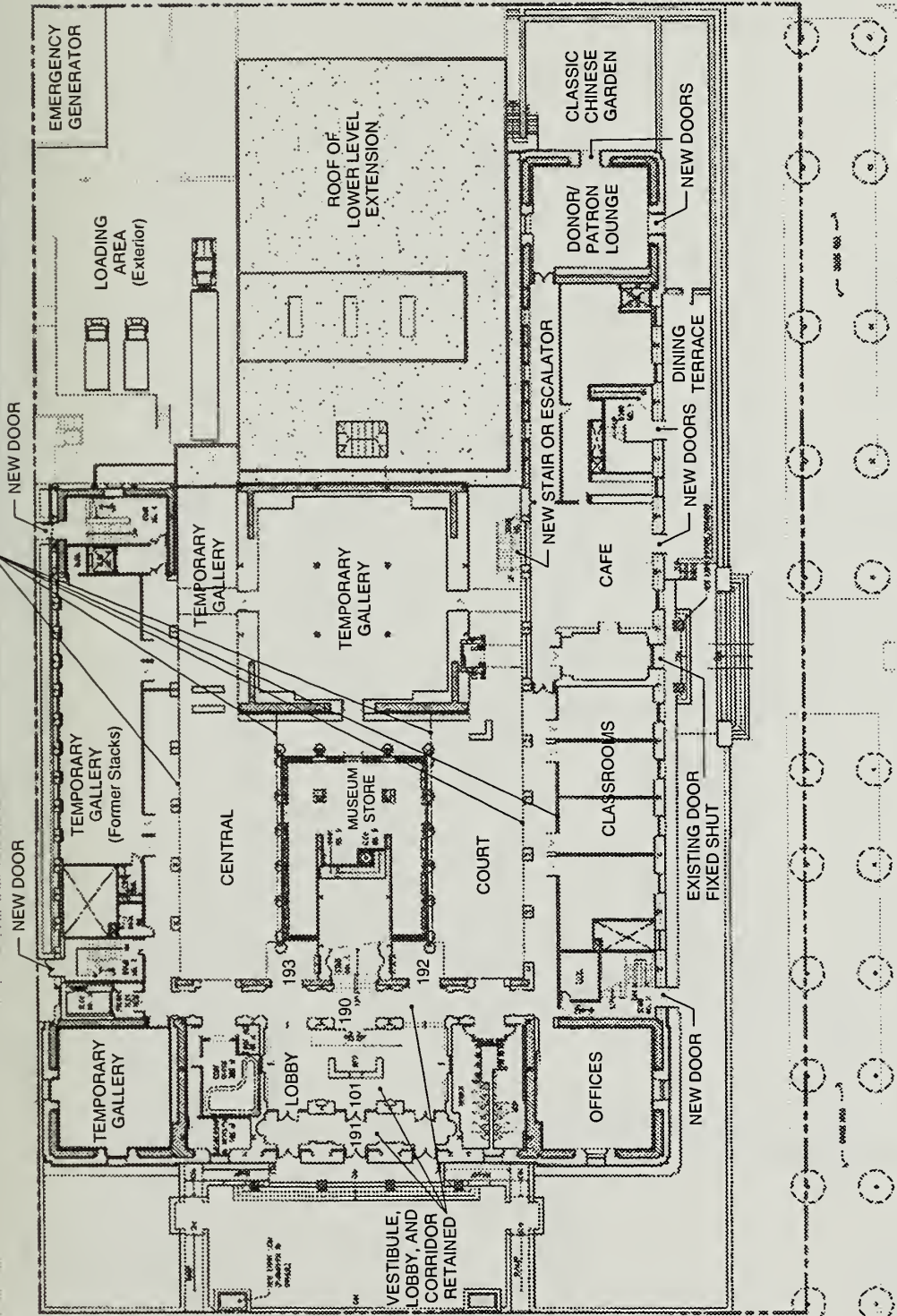
Principal interior features of the old Main Library building to be retained include the Main Entrance Hall and Vestibule; the Monumental Grand Staircase (note that the second floor loggia would be altered); and the General Reference room, or Great Hall. Wall, floor and ceiling finish materials in these spaces would be saved and protected during construction; some architectural detailing, including baseboards, panels, molding, cornices, and hardware, may not be preserved. In the Great Hall, a new elevator would encroach approximately one foot into the room at the south side. Portions of the Monumental Public Corridors and Balcony Spaces would be retained, and the two large reading rooms and three smaller corner rooms would be retained (note that a new third floor would be added within these rooms, effectively dividing these double-height spaces into two floors). The existing decorative beamed ceilings in the two large reading rooms would be retained and protected during construction.

The project would demolish for the proposed adaptive reuse most of the old Main Library's existing ground floor and existing third floor. Portions of the interior walls on the second floor would be removed to provide a more open floor plan, and, as noted, a new third floor would be added in the large second-story reading rooms. Some of the spaces to be demolished or altered are identified as Exceptionally Significant Interior Spaces in the Planning Code (see Section III.A, Historic Architectural Resources, Impacts, p. 57 for more information). Principal interior alterations would include:

- construction of a new, three-story-high open Central Court surrounding the existing Monumental Staircase (Room S101) to serve as the principal gathering / reception area in the museum. This court would be created by incorporating the two existing light courts into the interior space. This would entail installation of sloped glass skylights over the light courts that are north and south of the existing Monumental Staircase and General Reference room, or Great Hall (Room 200). Openings approximately 14 feet square would be cut into walls of the light courts at the first and second stories, opening into the new Central Court from the north and south wings of the building. The Central Court would also be open to the Monumental Staircase with removal, from the loggia (balcony) at the top of the staircase, of the non-structural wall panels (and steel columns within the walls) supporting the existing Gottardo Piazzoni murals; the wall base and entablature in the loggia (including inscriptions) would be retained, and new structural columns would be added. The existing corridor that formerly led to the Children's Room and Business, Science, Technology and Government Documents department would be incorporated into the Central Court. Figures 6 and 7, pp. 37 and 38, show the proposed ground floor and second floor plans. The interior walls of the Central Court (including the former light court walls) would be finished in an "art waxed" plaster. The eastern end of the Central Court would include glass walls on either side of the existing Great Hall, as shown in Figure 8, p. 39.
- conversion of former library spaces to galleries, classrooms, a museum research library, offices, and a bookstore and cafe;
- demolition of the existing seven-story library stacks in the north (McAllister Street) wing and construction of new floors to match the existing lower level and first and second stories and the proposed new third floor (see next paragraph), including excavation below for new foundations;
- addition of a new third floor throughout the entire building. This level would consist of gallery space through the north, west and south wings of the museum, including installation of a new floor level in the existing two-story reading rooms on the west and south sides of the old Main Library building (the former History and Literature departments, respectively). In these rooms, the new floor would be set back approximately five feet from the exterior wall. Railings would extend along the outer edge of this "floating" floor, allowing patrons to look up to the decorated ceiling from below and down to the second floor from the new level. In the smaller square rooms at the northwest, southwest, and southeast corners of the buildings, the new third floor would be set back less from the exterior wall due to new 1½-foot-thick concrete shear walls inside the existing exterior walls (see Seismic Upgrade, p. 25). In the north wing of the building, the new floor would be constructed in the former stack area; this new floor would not be set back from the exterior walls. The new third floor in the two reading rooms and the three smaller corner reading rooms would provide approximately 40 percent, or about 11,750 sq. ft., of the 29,000 sq. ft. of gallery space for the museum's permanent collection; an additional 2,750 sq. ft. would be gained at the new third floor in the former library stacks. Figure 8, p. 39, depicts the proposed new third floor plan. Figures 8A through 8D, pp. 39a – 39d, present existing and proposed interior elevations of the west and south second floor reading rooms (Rooms 201 and 210).

McALLISTER STREET

WALLS DEMOLISHED (Columns Retained)



LARKIN STREET

HYDE STREET

FULTON STREET

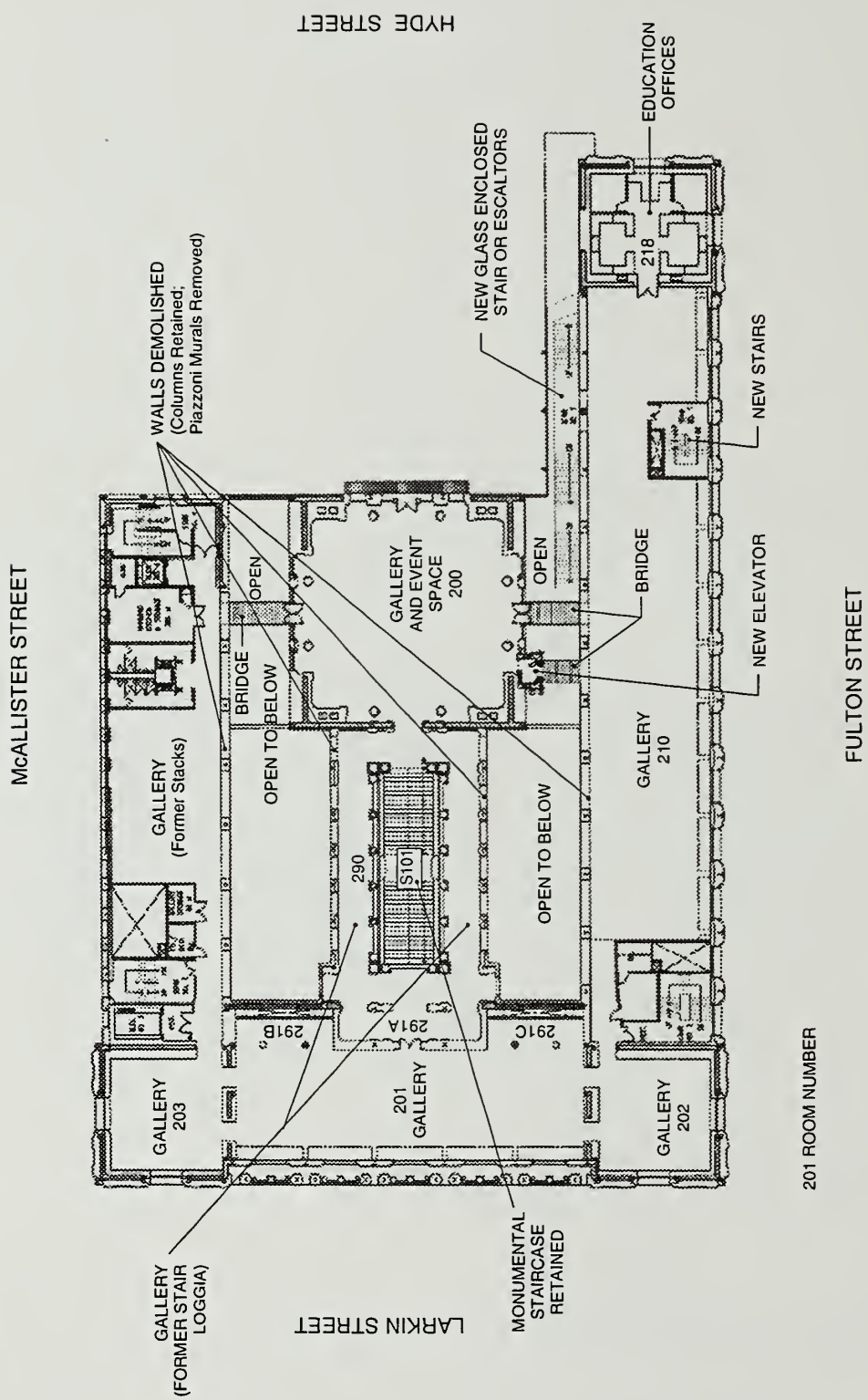
101 ROOM NUMBER



97.750E Asian Art Museum / ESA 970419

SOURCE: HOK / LDA / RWA

Figure 6
Proposed Ground Floor Plan

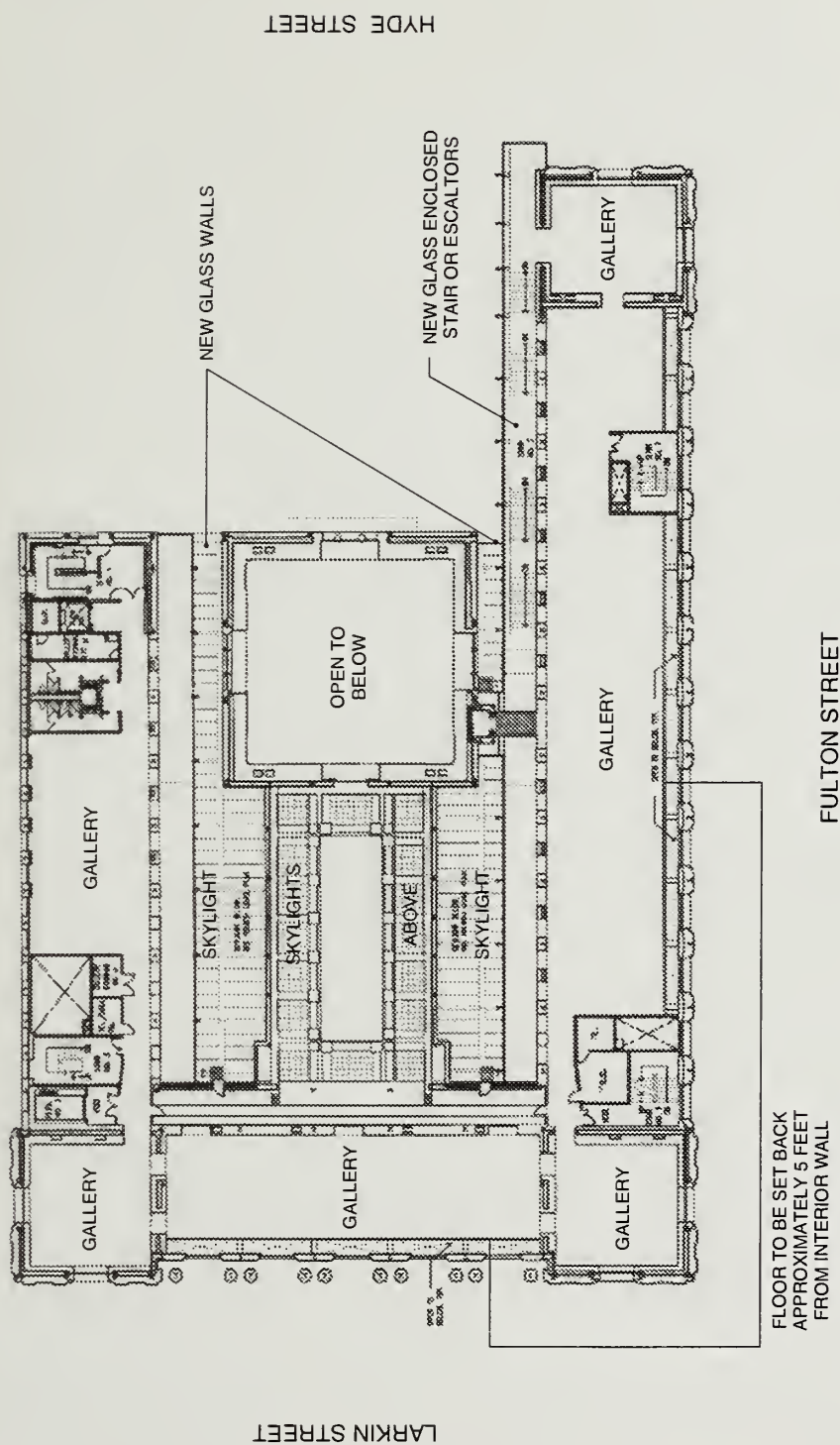


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Figure 7
Proposed Second Floor Plan

SOURCE: HOK / LDA / RWA

McALLISTER STREET

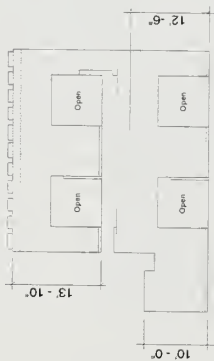


97.750E Asian Art Museum / ESA 970419 ■

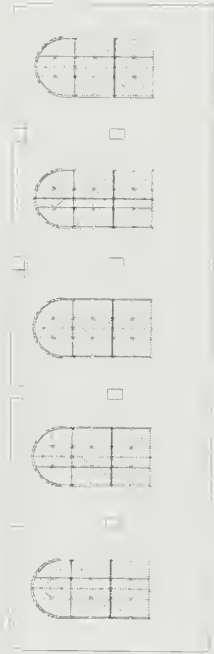
Figure 8

Proposed New Third Floor Plan

SOURCE: HOK / LDA / RWA



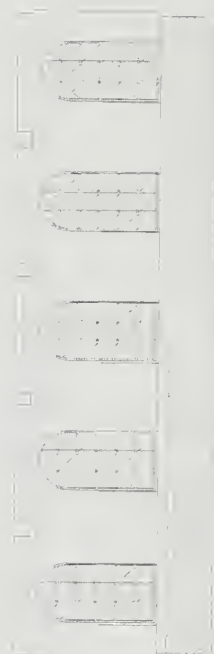
South
Proposed



West



South
Existing



West



SOURCE: HOK/LDA/RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 8A •
West Gallery Interior Elevations-
South and West Walls
(Room 201)



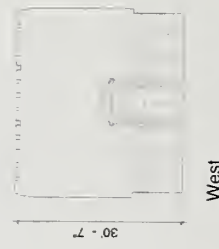
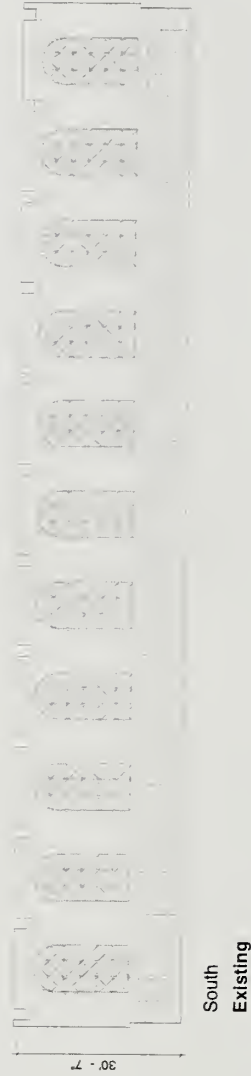
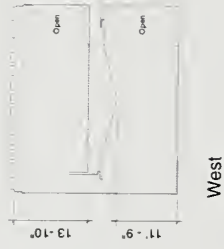
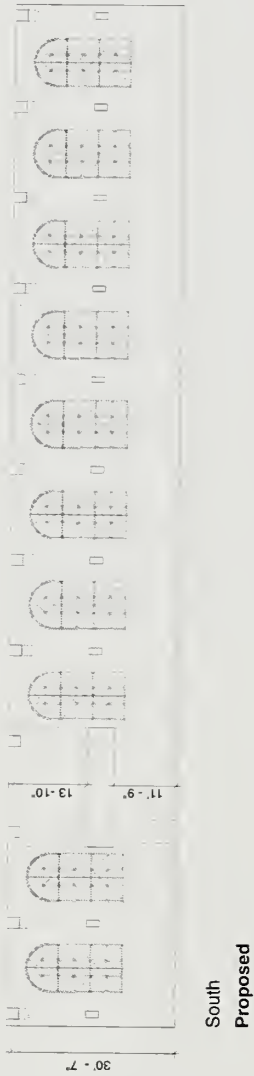
Key Plan



SOURCE: HOK/LDA/RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 8B •
West Gallery Interior Elevations-
North and East Walls
(Room 201)

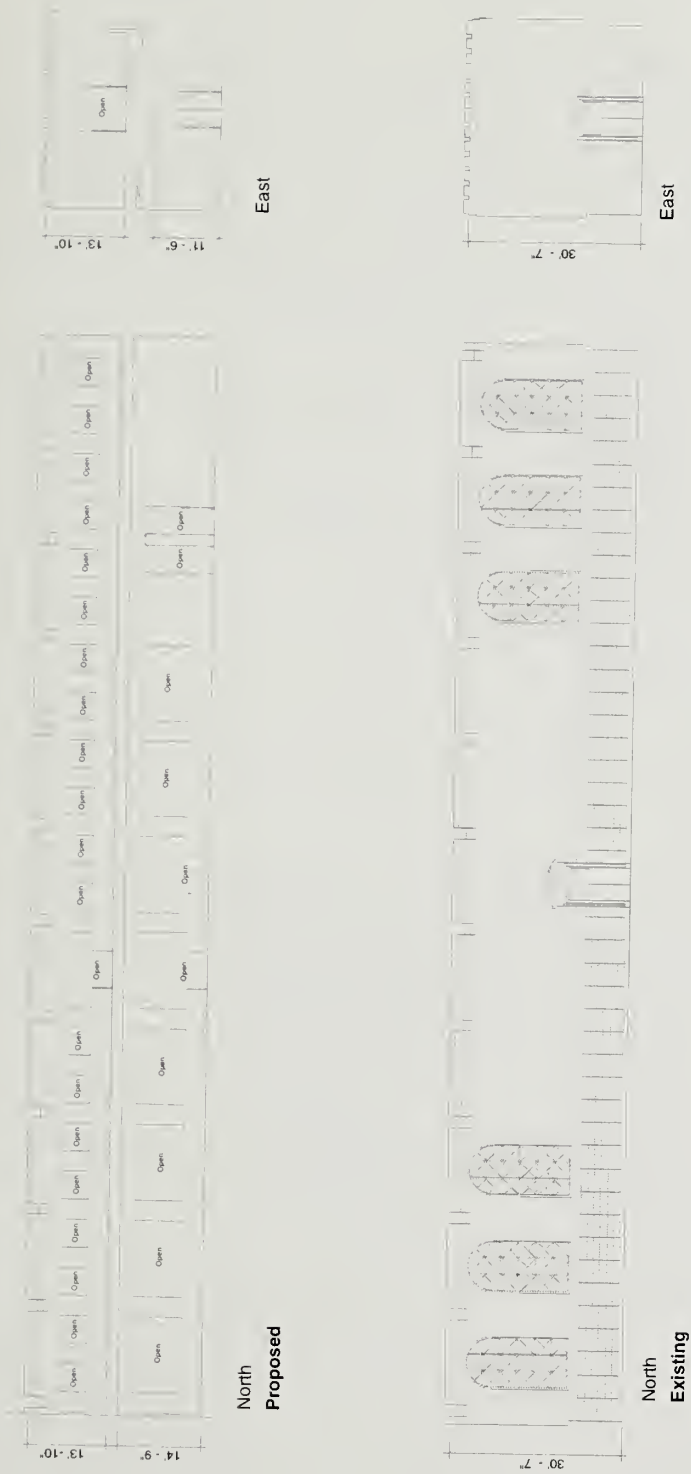


Key Plan

SOURCE: HOK/LDA/RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 8C
South Gallery Interior Elevations-
South and West Walls
(Room 210)



SOURCE: HOK/LDA/RWA



Key Plan

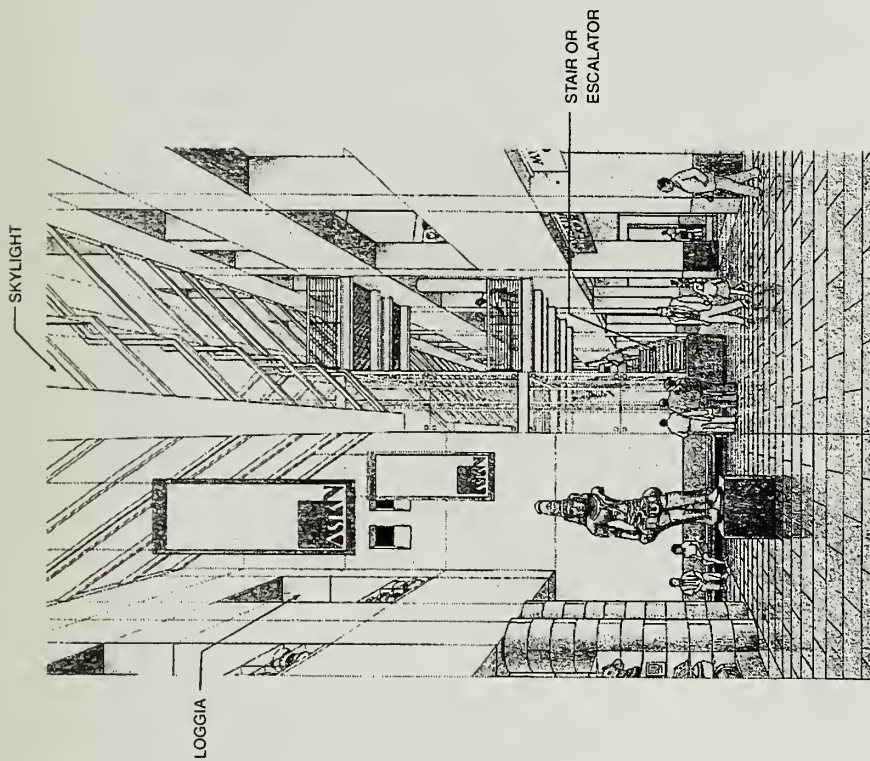
97.750E Asian Art Museum / ESA 970419 ■

Figure 8D •

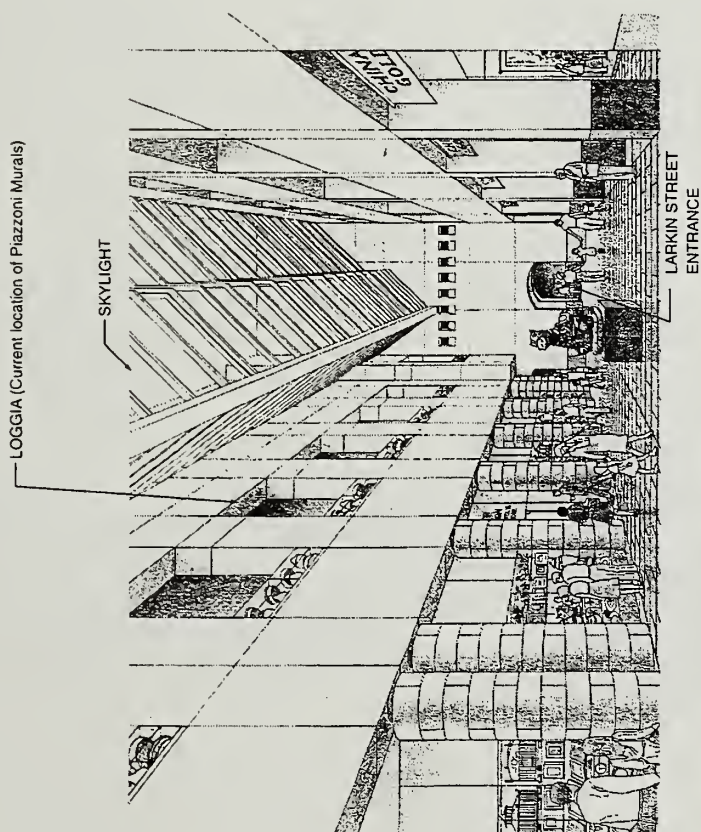
South Gallery Interior Elevations-
North and East Walls
(Room 210)

- demolition of parts of the existing east walls of the Larkin Street reading room (Room 201) on the second floor to incorporate into this room existing corridors (Rooms 291B and 291C) north and south of the loggia, at the second floor only;
- construction of a cantilevered, glass-enclosed stairway or escalators between the new Central Court and the second- and new third-floor gallery spaces;
- consolidation of several existing levels at the ground floor and reconstruction of this floor on a single level to, among other things, enhance disabled access.;
- construction of pedestrian bridges over the Central Court at the second floor between the Great Hall and gallery space in the north and south wings;
- conversion of the Fulton Street entry lobby (Rooms 198 and 198A) to a dining room attached to the proposed cafe, including removal of an existing glazed partition and installation of a new glazed partition and new door;
- remodeling of old Main Library third floor (proposed fourth floor) to accommodate a research library and museum offices; and
- construction of new restrooms and elevators required for accessibility and installation of mechanical systems, including climate (humidity) control required for conservation of the museum's resources. One of the four new elevators, adjacent to the proposed glass-enclosed stair or escalators, would protrude approximately one foot into the Great Hall; this elevator would be linked to the second- and third-floor galleries by a pedestrian bridge over the Central Court.
- removal of existing Gottardo Piazzoni murals on the walls of the second floor stair loggia. These murals, located on the east wall and on either side of the Monumental Staircase, date from the 1930s and 1940s. They are proposed for off-site relocation and conservation by the Asian Art Museum, assuming a suitable site can be found. (Final disposition of the Piazzoni murals is not determined; see impacts discussion on p. 66).
- removal of murals in the two large second floor reading rooms by Frank duMond, dating from the 1915 Panama-Pacific Exposition. The duMond murals are proposed for relocation by the museum in conjunction with the Art Commission. (Final disposition of the duMond murals is not determined.)
- removal of bookcases from the reading rooms and other former library program spaces.

Figures 9 and 9A depict architect's renderings of interior views through the proposed Central Court along the length of the old Main Library building. These views illustrate the design intent to enlarge the interior space incorporating light courts that now exist on the ground floor of the building. The views show the proposed opening of the second floor loggia, where the Piazzoni murals currently exist, through demolition of most of the existing loggia walls. Also visible is



LOOKING EAST ALONG SOUTH SIDE OF CENTRAL COURT

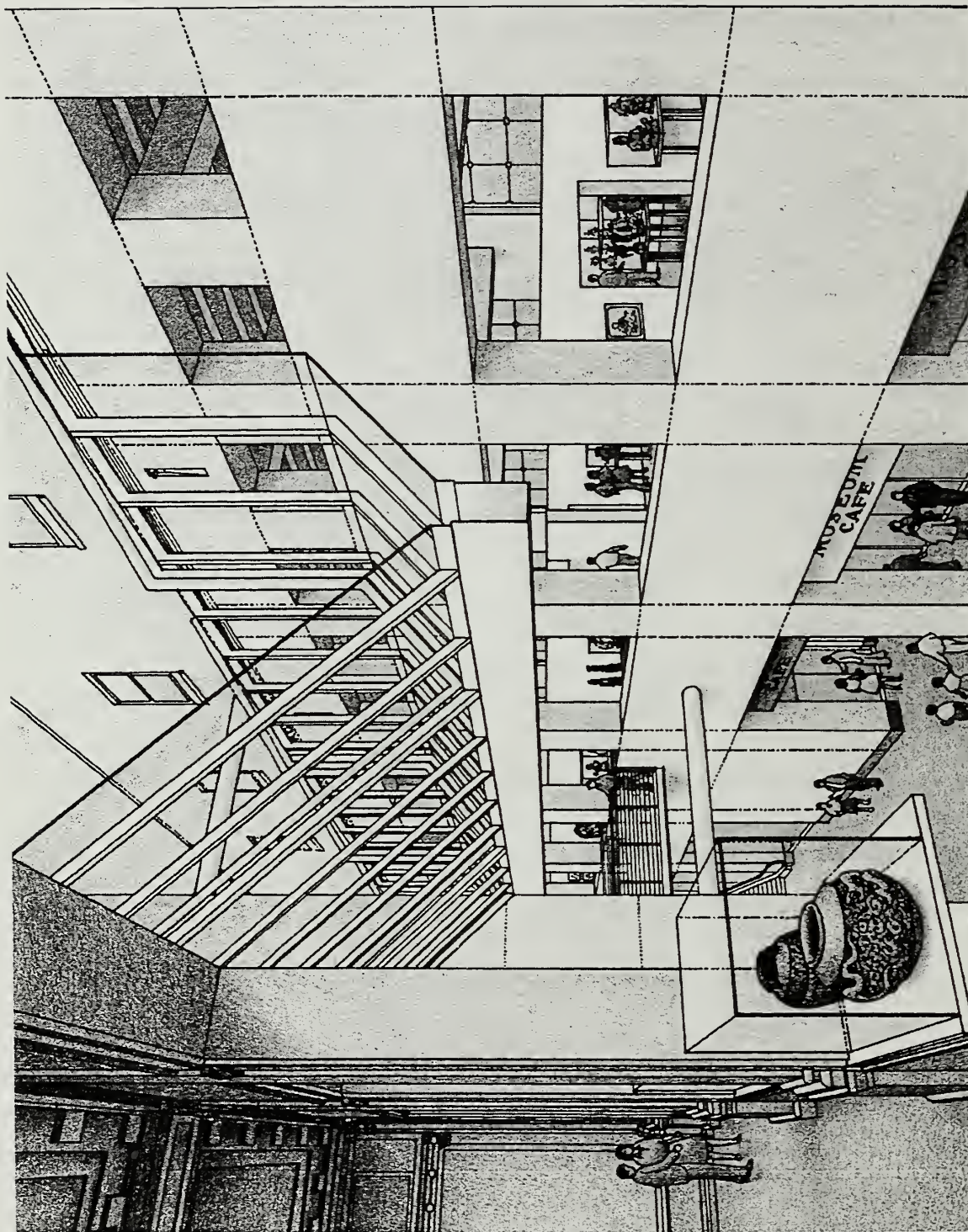


LOOKING WEST ALONG NORTH SIDE OF CENTRAL COURT

97.750E Asian Art Museum / ESA 970419 ■

SOURCE: HOK/ILDA/RWA

Figure 9
Architect's Renderings of Views
Through Proposed Central Court



97.750E Asian Art Museum / ESA 970419 ■ **Figure 9A •**
 Architect's Rendering of Proposed
 Central Court, Looking Southeast
 from Stair Loggia

SOURCE: HOK / LDA / RWA

proposed demolition of the exterior walls of the existing light courts to create openings into the interior walls of galleries that are to occupy the south second-floor reading room and the former library stacks in the building's north wing.

INTERIOR CIRCULATION AND PROGRAM SPACES

The building's main entrance would remain on Larkin Street. The existing secondary entrance on Fulton Street would remain in place but would not be used for the museum; it was closed with the library in recent years. This entry would be converted to a portion of the cafe dining area.

According to the project architects, the proposed new Central Court would serve as the focal point for museum visitors. It is intended to provide visitors with a sense of place and spatial orientation that the museum believes would otherwise not be provided, given the building's relatively small Main Entrance Lobby and Vestibule, immediately inside the Larkin Street entrance. The Central Court would allow visitors to use the museum's bookstore, cafe and classrooms without entering the paid portion of the museum.

According to the project sponsor, the old Main Library building's entrance lobby is too small to function as a museum lobby, with attendant ticket purchases, queuing of patrons to enter gallery areas, and group assembly. Under the proposed circulation scheme, visitors would enter the Central Court from the Larkin Street lobby and purchase tickets in the court, which would also serve as a gathering place.

Visitors would enter the museum's permanent collection at a control point near the southeast corner of the Central Court (to the right, or south, of the existing Monumental Staircase). There would be a similar control point on the north side of the Central Court for access to the special (temporary) exhibition spaces. From the south control point, visitors could use the new glass-enclosed stairway (or escalators) or an elevator to the second- and third-floor galleries, or could enter the galleries via the existing Monumental Staircase. A second new stairway would connect the second and third-floor galleries at the north side of the building (and would serve as an emergency exit stair).. Return to the Central Court would be via the glass-enclosed stairway (or escalators) or the Monumental Staircase.

A glass-enclosed public elevator would be constructed adjacent to the new stairway (or escalators), and a second elevator at the north side of the building would provide public access between gallery levels. Existing elevators and shafts would be removed. Existing stairs other than the Monumental Staircase would be demolished.

Primary exhibition galleries would be in the former large reading rooms (the former Literature and History departments) on the second floor, and in the new third level to be installed within those spaces. The two-story Great Hall, which most recently served as the General Reference room in the old Main Library, would be converted to a space for exhibitions, lectures, special events, and overflow gallery space. On the ground floor, in the former Children's reading room and an adjoining office, three classrooms and a new interior emergency exit stair would be constructed. The former Lurie Room would be divided into four rooms for volunteers and

docents and a resource center. The former Fine Arts department would be converted to the cafe and kitchen. The cafe would include an outdoor seating terrace, to be built along the eastern end of the south wing, in what is now a grass-covered and tree-lined area atop the building's plinth, or base. As noted previously, the existing Fulton Street entrance lobby would be converted to a dining room as part of the museum cafe.

The former Business, Science and Technology and Government Documents department would become a temporary exhibition gallery, as would the former ground floor stacks and staff room in the northwest corner of the building. The project would remodel existing offices and storerooms beneath the Monumental Staircase to accommodate a museum store. On the fourth floor (old Main Library third floor), the Periodicals room and former library office space would be remodeled to accommodate a research library and museum offices. The former San Francisco History Room and the remainder of the existing third floor would become offices and meeting rooms for museum staff.

EXPANSION SPACE

Subject to available funding, the project calls for construction of an addition to the old Main Library building at 45 Hyde Street, where a three-story vacant former city office / library annex building was demolished in 1997. This Phase 2 expansion space would be a three-story addition to the building atop the currently proposed expansion of the lower level (basement) with a 400-seat auditorium/theater⁶ and two levels containing about 16,500 sq. ft. of museum gallery and office space and about 4,000 sq. ft. of service space for the auditorium (dressing rooms, control room, storage, etc.). This addition could be faced with gray granite or precast concrete panels, intended to be similar in color and texture to the old Main Library building and most other monumental structures in the Civic Center. The addition would be approximately 80 feet tall, corresponding to the height of the old Main Library building, set back about 5 feet from Hyde Street. A second loading ramp, in addition to that proposed for the museum, would access the basement of the addition to serve the auditorium/theater.

The auditorium/theater addition would be connected to the glass-covered Central Court proposed as part of the project, and would also have a separate entrance from Hyde Street, where the addition could include a glass-enclosed auditorium/theater lobby.

Another future addition, also subject to funding, would include a base-isolated extension of the existing building's north wing to provide additional gallery space. This Phase 3 addition, if built, is envisioned to continue the old Main Library's McAllister Street facade east to near Hyde Street, also at an 80-foot height. It would include about 15,000 sq. ft. of gallery and museum office space and about 5,000 sq. ft. of work rooms, storage, and other service space.

⁶ As noted previously, the Asian Art Museum project as described in the *Main Library/Asian Art Museum FEIR* also assumed a 400-seat auditorium.

C. PROJECT COST AND SCHEDULE

Project construction is anticipated to begin in early 1999 and last about 24 to 30 months, with opening of the museum, following a move-in period, planned for the third quarter of 2001. Construction cost is estimated at \$123 million (1998 dollars), including seismic strengthening and construction, with an additional projected cost of \$22 million for the potential future Phase 2 and 3 expansion space (see p. 43).

The project architect is a joint venture of Hellmuth, Obata, Kassabaum, Inc.; LDA Architects; and Robert B. Wong - Architect, in association with Dott. Arch. Gae Aulenti, FAIA. The project preservation architect is Page & Turnbull.

Construction staging for alteration of the old Main Library building would occur at the vacant 45 Hyde Street site and on the various building frontages. It is anticipated that the curb lane and the sidewalks on Larkin, McAllister and Hyde Street would be closed during construction, as would the building setback on Fulton Street between Larkin and Hyde Streets; the sidewalk immediately adjacent to the curb on Fulton Street would likely remain open.

D. APPROVAL REQUIREMENTS AND GENERAL PLAN POLICIES

This SEIR will undergo public comment, including a public hearing before the City Planning Commission. Following the public comment period, responses to written and oral comments will be prepared and published in a Draft Summary of Comments and Responses document. The SEIR will be revised accordingly and presented to the City Planning Commission for certification as to accuracy, objectivity, and completeness. Although the City's Landmarks Preservation Advisory Board may make its recommendations following consideration of the Draft EIR, no approvals or permits may be issued before the Final SEIR is certified.

Decision-makers, in determining whether to approve the project, will need to consider this SEIR along with the Main Library/Asian Art Museum FEIR, certified February 27, 1992, and the 1996 EIR Addendum. Required approvals include the following:

APPROVALS

The City Planning Commission, with advice of the Landmarks Preservation Advisory Board, must approve a Certificate of Appropriateness for exterior and interior alterations to the old Main Library building.

The proposed project may require a finding by the City Planning Department of project consistency with the General Plan.

The City Planning and Recreation and Park Commissions must determine whether new shadow on Civic Center Plaza would be significant; if the shadow is not *de minimus*, the project would require revision of the Absolute Cumulative Limit for Civic Center Plaza, under the sunlight ordinance to allow for project shadow on this space (Planning Code Sec. 295).

The Zoning Administrator must approve a Variance for less than the Planning Code-required amount of parking, including the Phase 2 and Phase 3 projects at 45 Hyde Street.

The Board of Supervisors would need to appropriate funds for the renovation of the old Main Library building to accommodate the Asian Art Museum.

The Asian Art Commission must approve the project.

The proposed project requires demolition and building permits from the Department of Building Inspection.

GENERAL PLAN

The San Francisco General Plan, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The City Planning Commission would review the project in the context of applicable objectives and policies of the General Plan.

On November 4, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative, which established eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA), or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The City Planning Commission in deciding whether to approve the Certificate of Appropriateness, the Zoning Administrator in the Variance decision, the City Planning Commission in determining the significance of shadow and revising the Absolute Cumulative Limit for Civic Center Plaza, if necessary, will make a determination of the project's conformance with the Priority Policies (Planning Code Section 101.1) and will so advise the Recreation and Park Commission, the Board of Supervisors, and the Asian Art Commission.

Applicable General Plan policies include the following:

COMMERCE AND INDUSTRY ELEMENT

- Objective 2, Policy 3, to "maintain a favorable social and cultural climate in the city in order to enhance its attractiveness as a firm location."

RECREATION AND OPEN SPACE ELEMENT

- Objective 2, to “develop and maintain a diversified and balanced city-wide system of high quality public open space;” Policy 3, to “preserve sunlight in public open spaces;” and Policy 7, to “acquire additional open space for public use.”

TRANSPORTATION ELEMENT

- Policy 1.3, to “give priority to public transit as the means of meeting San Francisco’s transportation needs, particularly those of commuters;” and Policy 1.7, to “assure expanded mobility for the disadvantaged.”
- Objective 28, to “provide secure and convenient parking facilities for bicycles;” Policy 28.1, “provide secure bicycle parking in new governmental, commercial and residential developments;” and Policy 28.3, to “provide bicycle parking facilities which are safe, secure, and convenient.”
- Policy 40.1, to “provide off-street facilities for freight loading and service vehicles on the site of new buildings sufficient to meet the demands generated by the intended uses. Seek opportunities to create new off-street loading facilities for existing buildings;” and Policy 40.2, to “discourage access to off-street freight loading and service vehicle facilities from transit preferential streets, or pedestrian-oriented streets and alleys by providing alternative access routes to facilities.”

URBAN DESIGN ELEMENT

- Objective 1, “emphasis of the characteristic pattern which gives to the city and its neighborhoods an image, a sense of purpose, and a means of orientation;” Policy 3, to “recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts;” Policy 4, to “protect and promote large-scale landscaping and open space that define districts and topography;” Policy 5, to “emphasize the special nature of each district through distinctive landscaping and other features;” Policy 6, to “make centers of activity more prominent through design of street features and by other means;” and Policy 7, to “recognize the natural boundaries of districts, and promote connections between districts.”
- Objective 2, “conservation of resources which provide a sense of nature, continuity with the past, and freedom from overcrowding;” Policy 4, to “preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development;” Policy 5, to “use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings;” Policy 6, to “respect the character of older development nearby in the design of new buildings;” and Policy 7, to “recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco’s visual form and character.”
- Objective 4, “improvement of the neighborhood environment to increase personal safety, comfort, pride and opportunity;” Policy 3, to “provide adequate lighting in public areas;”

Policy 4, to “design walkways and parking facilities to minimize danger to pedestrians;” and Policy 5, to “provide adequate maintenance for public areas.”

ENVIRONMENTAL PROTECTION ELEMENT

- Objective 1, Policy 4, to “assure that all new development meets strict environmental quality standards and recognizes human needs.”
- Objective 12, to “establish the City and County of San Francisco as a model for energy management.”
- Objective 15, to “increase the energy efficiency of transportation and encourage land use patterns and methods of transportation which use less energy;” and Policy 3, to “encourage an urban design pattern that will minimize travel requirements among working, shopping, recreation, school and childcare areas.”

COMMUNITY SAFETY ELEMENT

- Policy 2.7, to “abate structural and non-structural hazards in City-owned structures;” and Policy 2.8, to “preserve, consistent with life safety considerations, the architectural character of buildings and structures important to the unique visual image of San Francisco, and increase the likelihood that architecturally and historically valuable structures will survive future earthquakes.”

CIVIC CENTER AREA PLAN

- Objective 1, to “maintain and reinforce the Civic Center as the symbolic and ceremonial focus of community government and culture;” Policy 1, to “emphasize key public buildings, particularly City Hall, through visually prominent siting;” Policy 2, to “maintain the formal architectural character of the Civic Center;” Policy 3, to “design Civic Center buildings and open spaces to serve as public gathering places for ceremonial, cultural, recreational, and other community activities;” Policy 4, to “provide a sense of identity and cohesiveness through unifying street and Plaza design treatments;” and Policy 5, to “maintain existing streets as vehicular, pedestrian or open space corridors.”
- Objective 2, to “develop the Civic Center as a cohesive area for the administrative functions of city, state, and federal government, and as a focal point for cultural, ceremonial, and community activities;” Policy 1, to “design the Civic Center to promote efficiency and convenience within and between the governmental entities represented, and provide for their orderly expansion;” and Policy 2, to “locate civic cultural facilities in the Civic Center.”
- Objective 3, to “provide convenient access to and circulation within the Civic Center, and support facilities and services;” and Policy 1, to “locate buildings employing large number of employees and/or attracting large numbers of visitors in convenient pedestrian proximity to public transit and off-street parking facilities.”

DRAFT CIVIC CENTER PLAN

In addition to the above adopted General Plan policies, the Planning Department in October 1994 published a draft Civic Center Study, including proposed revisions to the Civic Center Area Plan. Although not adopted, the following information on the draft plan is provided for the reader's information.

The draft Civic Center plan calls for ensuring the vitality of Civic Center by locating and promoting a variety of diverse daytime and nighttime cultural facilities and activities within the area (Objective 1, Policy 3). The draft plan also calls for Civic Center buildings and open spaces to serve as public gathering places (Objective 1, Policy 4), recommends preserving and strengthening the urban form of Civic Center (Objective 2), protecting view corridors (Objective 2, Policy 1), and promoting harmony in building heights while maintaining the prominence of City Hall (Objective 2, Policy 2). Objective 3, Policy 1 calls for maintenance of the formal architectural character of Civic Center with City Hall as the centerpiece, while Objective 3, Policy 4 calls for preservation and appropriate restoration of historic Civic Center buildings to maintain their established style and contribution to the Beaux Arts composition of Civic Center while insuring flexibility for adaptive reuse, and for applying nationally and locally established standards for the treatment of historic properties in alteration and reuse. The project site is within the Primary Facades portion of the core area under the draft Civic Center plan, which includes proposed design guidelines for recommending compatible restoration and construction within Civic Center, making reference to a portion of Standard No. 9 from the Secretary of the Interior's *Standards for Rehabilitation* regarding additions to historic buildings, "... The new work shall be differentiated from the old and shall be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment."

The project would respond, in general, to the above noted General Plan Objectives and Policies.

REFERENCES - Project Description

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, as part of the project file.

Asian Art Museum, "Statement on the Preservation of the Piazzoni Murals." August 1997

Aulenti, Gae, "Piazzoni Murals Review Panel Report." This report was prepared in response to the Board of Supervisors' creation of a Piazzoni Murals Review Panel. 1997

Lord Cultural Resources Planning and Management Inc., *Asian Art Museum of San Francisco Master Plan*, March 1996.

Rutherford & Chekene, 1992, *Seismic Upgrading Study of the Main Public Library Building, San Francisco, California, for the Asian Art Museum at the Civic Center*, September.

Sano, Emily, Director, Asian Art Museum, comments before the San Francisco Landmarks Preservation Advisory Board, February 4, 1998. (Transcript available at the Planning Department.)

CHAPTER III

ENVIRONMENTAL SETTING AND IMPACTS

This chapter focuses on the impact of the currently proposed project on historic architectural resources. Considerably more detail is known about the project design as developed than was the case when the Main Library/Asian Art Museum FEIR was certified. The impacts analysis contained herein supplements and updates the analysis of impacts to historic architectural resources in the FEIR. This chapter also compares effects related to shadow, urban design, transportation, air quality, and growth inducement to those reported in the Main Library/Asian Art Museum FEIR. The basic development program for the museum remains generally the same as for the design developed. Therefore, for other topics included in the Main Library/Asian Art Museum FEIR, effects on land use and zoning; population and employment; construction noise; geology; energy; hazards; and archaeological resources would be similar to those identified in the FEIR, and no new analysis is required.

A. HISTORIC ARCHITECTURAL RESOURCES

As noted in the Introduction, p. 1, the City Planning Commission, in certifying the Main Library/Asian Art Museum FEIR, identified a significant impact on architectural and historic resources (also referred to as historic architectural resources) due to alteration of the old Main Library building. This analysis incorporates, summarizes, and updates the environmental setting in the Main Library/Asian Art Museum FEIR. Regarding impacts, the current project includes essentially the same development program and with most of the same primary physical elements analyzed in the FEIR. It also includes substantive changes in other physical elements / alterations, compared to those evaluated in the FEIR. Therefore, this discussion replaces the impacts analysis in the Main Library/Asian Art Museum FEIR and the 1996 EIR Addendum, based on the current, more advanced and more detailed description of the proposed Asian Art Museum project. The conclusion of this SEIR remains the same as that reached by the Planning Commission: the project would result in a significant effect on historic architectural resources.

SETTING

This section summarizes and updates the Setting discussion in the Main Library/Asian Art Museum FEIR (pp. 52-64), which is incorporated by reference.

CIVIC CENTER AND HISTORIC DISTRICTS

The Civic Center is designated both a National Historic Landmark District and a Historic District on the National Register of Historic Places, in recognition of the national importance of this Beaux Arts Civic Center group of buildings. Generally, listing on the National Register

acknowledges that certain properties are worthy of preservation and limits alterations in federally funded projects (the National Historic Landmark designation entails a somewhat higher degree of review). Listing does not impose conditions on alterations or demolition for non-federally funded projects. The project would not include use of federal funds for construction.

The old Main Library building is identified as a Contributory building in both the National Register Historic District and in the National Historic Landmark District. The project site is located within the local Civic Center Historic District, approved by the Board of Supervisors December 23, 1994, subsequent to certification of the Main Library/Asian Art Museum FEIR, and the building is a Contributory building within this local district. Figure 10 presents boundaries of the historic districts.

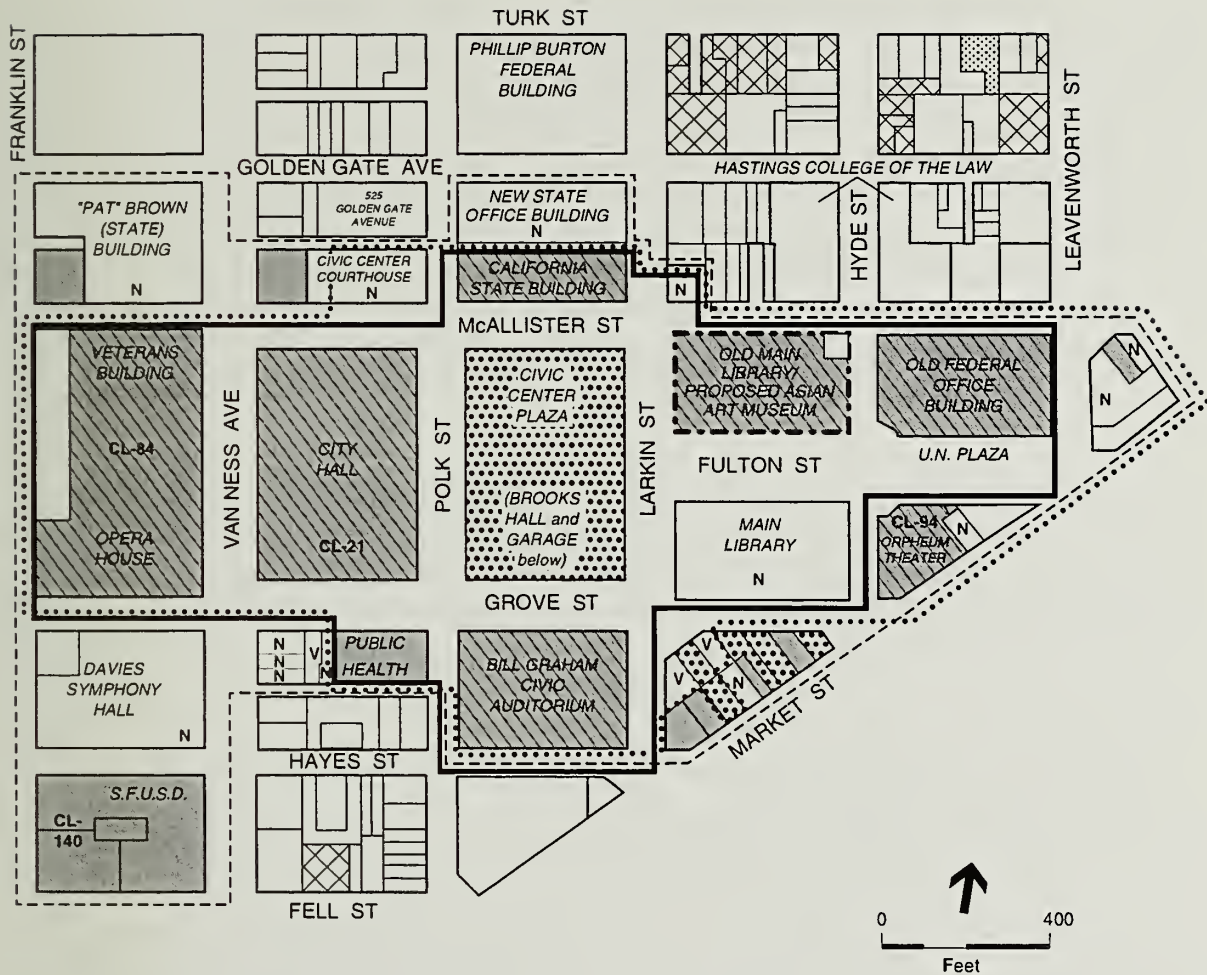
The Planning Code regulations concerning the Civic Center Historic District (Article 10, Appendix J) include controls on demolition and alteration of structures throughout the district. Besides controls on building exteriors, the Civic Center district recognizes the importance of certain interior spaces in Civic Center buildings, including the old Main Library. These spaces are (numbers in parentheses are room identification numbers):

the Monumental Grand Staircase (Room S101), the Main Entrance Hall (101) and Vestibule (191), the Monumental Public Corridors and Balcony Spaces (190, 192, 193, 290, and 291A), including the Gottardo Piazzoni Murals in Public Corridor [Balcony] 290, and the Main Program Spaces [General Reference room and second-floor reading rooms] (200, 201, 202, 203, 210, and 218).

Each of the above spaces is designated an Exceptionally Significant Interior Space in Appendix J of Article 10 (Sec. 10).⁷ A Certificate of Appropriateness is required for alterations to these spaces, as well as for major exterior alterations. A Certificate of Appropriateness must be approved by the Planning Commission or Department staff on the advice of the Landmarks Preservation Advisory Board. The standards for review of Certificates of Appropriateness are contained in Section 1006.7 (generally) and in Article 10, Appendix J, Section 9 (specific provisions for the Civic Center Historic District) of the Planning Code.

The Civic Center has been the site of city government since construction began on Old City Hall in 1872. That building, on a triangular site bounded by McAllister and Larkin Streets and a line parallel to and just north of Market Street, was destroyed in the 1906 earthquake and fire. The 1912 Civic Center plan, approved by the Board of Supervisors, resulted in today's Civic Center, a group of primarily public buildings that makes up what is considered by many scholars as the nation's finest and most complete collection of buildings in the style of the Beaux Arts inspired City Beautiful movement (Corbett, 1974).

⁷ This use of the word significant in the context of historic architectural resources is to be differentiated from its use in the sense under CEQA that denotes an effect that constitutes a substantial adverse change in the environment. Significant, when used in reference to historic architectural resources, denotes a resource's importance, in that context.



**San Francisco
Civic Center Historic District**

--- Project Site

--- District Boundary

Contributory

Contributory / Altered

N Noncontributory

V Vacant Lot (noncontributory)

National Register of Historic Places

..... Historic District Boundary

— National Historic Landmark
District Boundary

Contributor to Listed District

Contributor to Eligible (unlisted) District
or Eligible for Separate Listing

Historic Place (individually listed)

SOURCE: San Francisco Planning Department
State Office of Historic Preservation:
National Park Service
Environmental Science Associates

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Figure 10 (Revised) •
Civic Center Historic Districts

This district is anchored by five large parcels with prominent public buildings on Civic Center Plaza. They include City Hall (currently undergoing seismic upgrade and renovation), the Bill Graham Civic Auditorium (recently upgraded and renovated), the old Main Library building, the State of California building (currently undergoing upgrade and renovation), and the New Main Library; the first four buildings are identified as contributors to the National Register Historic Districts and the local Civic Center Historic District. Other contributors include the Opera House and Veterans' Building, the Department of Public Health building, Old Federal Building on U.N. Plaza, and the Orpheum Theater building. The New Main Library and the new Civic Center Courthouse at Polk and McAllister Streets, while employing stylistic elements common to the districts, are new buildings and are not contributors. The Orpheum is not a contributor to the smaller National Historic Landmark District. More than ten other buildings are contributors to the local district.

City Hall, at a total of 300 feet in height to the top of its dome, above 80-foot-tall wings, stands out as a visual landmark in the project area. For harmony of design and in deference to City Hall, most of the major Beaux Arts buildings in the Civic Center are approximately 80 feet tall at the parapet line (three or four stories of varying height); the Department of Public Health building is approximately 70 feet tall.

PROJECT SITE

The old Main Library, completed in 1917, was designed by George W. Kelham, one the architects whose work defines San Francisco's historic downtown. Kelham, whose San Francisco career began as supervising architect for the Palace Hotel (City Landmark No. 18) in 1909, also designed the Shell and Standard Oil Buildings on Bush Street, the Russ Building on Montgomery Street, and the Hills Brothers Building at the foot of Harrison Street (Landmark No. 157), as well as the Mount Davidson cross. Kelham's proposal for the San Francisco Public Library was selected following a design competition that attracted many of the top architects of the day.

Exterior Features

The old Main Library building is a granite-and-brick-clad steel frame building that occupies most of the block bounded by Larkin, McAllister, Hyde and Fulton Streets. The design conforms in shape and exterior decoration to the overall 1912 Civic Center Plan that guided construction of the other monumental structures, including City Hall, the Exposition (Bill Graham Civic) Auditorium, the State Office Building, and the Department of Public Health building.

The old Main Library was assigned the highest rating of "5" in the 1976 Department of City Planning Architectural Inventory and the highest rating of "A" by the Foundation for San Francisco's Architectural Heritage. As noted above, it is considered a Contributory building in the Civic Center Historic District and in both the National Register Historic and Historic Landmark Districts.

The building is approximately 80 feet high (height varies due to the slight slope of the site), with three stories of varying height, and in plan resembles a large "P" with its foot on Hyde Street. The building was designed in the Italian Renaissance Revival style, with a rusticated stone base that marks the ground floor, surmounted by a series of arched windows, columns and pilasters topped by an entablature (the horizontal portion of the building above the columns) that houses the third story and originally featured an inscription identifying and dedicating the library, spanning most of the width of the Larkin Street facade. This legend was covered in 1998 by a sign identifying the building as the Asian Art Museum. The principal Larkin and Fulton Street facades are clad in gray California granite, as is a single bay on both Hyde and McAllister Streets. The two-story windows on all four facades are covered by crosshatched cast-iron lattice work called clathri.

On the main facade along Larkin Street are three sets of entry doors. Above the doors are five recessed arches, each between a pair of columns, with projecting end bays framing the arches. Within each arch stands an eight-foot cement figure on a pedestal; they represent Art, Literature, Philosophy, Science, and Law. The figures, by Panama-Pacific International Exposition sculptor Leo Lentelli, were commissioned by the Library Commission and architect George Kelham in 1915-1917. The statues are hollow cast concrete with interior armatures of iron reinforcing bar and chicken wire. They have experienced degradation from exposure to weather, and much of the surface detail has been worn away. The statues show evidence of past minor repairs. One of the statues (figure two, from left to right when facing the building) has sustained cracking and appears to be structurally unsound. Figure one is in the best condition; figure four has suffered some structural damage but retains considerable surface detail, and figures three and five have some minor cracks and retain less detail than figure four (Wharton, 1996).

The Fulton Street facade includes a single doorway, with end bays identical to those on Larkin Street and with 13 arches between pilasters. There are ground floor windows in the base beneath each arch. Above the two-story arched windows along Larkin and Fulton Streets is a detailed frieze and cornice. The facade that projects closest to Hyde Street and the west end of the McAllister Street facade are identical to the Larkin Street end bays. Tablets inscribed with the names of literary figures are included beneath the large arched windows on each end bay. The remainder of the McAllister Street side of the building is simpler, with 17 narrow rectangular bays and a plain cornice. Two secondary facades, both of brick and both set back from the street, were obscured by the former 45 Hyde Street building until its demolition in 1997. The set back east facade includes a large two-story arched window at the east wall of the Great Hall (former library General Reference room). The north wall of the Fulton wing has four large two-story arched windows overlooking the 45 Hyde Street site.

The two open light courts enclosed by the building walls and open to the sky are clad in glazed brick that is a light gray-beige in color. The south court has three two-story arched windows that admit light to the main reading room on the second floor of the building's Fulton Street wing. The north court has seven stories of rectangular windows to illuminate the book stacks in the building's McAllister Street wing; each court also has an arched window to the Great Hall (General Reference Room) and windows at the third, or office, floor of the old Main Library.

The remainder of the site is now vacant; it formerly contained a city office building / library annex at 45 Hyde Street.

Interior Features

The interior organization of the old Main Library building is reflected on the exterior: the main entrance on the highly adorned Larkin Street facade with its triple doorways below the five recessed arches, and the two main reading rooms along the Larkin and Fulton Street sides of the building, each with giant two-story arched windows. Once inside the Larkin Street doorway, the interior plan is in the form of a progression of ceremonial spaces, a “parti” characteristic of the Beaux Arts style, from the Main Entrance Lobby (Room 101) and Vestibule (Room 191), into a north-south corridor (Room 190), up the ceremonial Monumental Staircase (Stair S101) flanked by the stair loggia, or balcony (Room 290), and into the 42-foot-tall Great Hall (Room 200) on the second floor. Access to the south (Fulton Street) reading room (Room 210) is directly south of the Great Hall, while the west (Larkin Street) reading room (Room 201) is reached via the loggia and a second-floor north-south corridor (Room 291A). The alternative circulation pattern from the ground floor is from corridor 190 into either of the two elaborate elevator lobbies (Rooms 192 and 193).

The Great Hall, where books were once delivered to patrons by library pages, later served as the General Reference room. The west and south sides of the second floor contain the two high-ceilinged reading rooms (the former library History and Literature departments, respectively), each 31 feet in height; three square rooms, also two stories, at the building’s northwest, southwest, and southeast corners, open into the two large reading rooms.

Along the balcony, or loggia, that surrounds the Monumental Staircase are 14 murals on canvas by Gottardo Piazzoni that date from the 1930s and 1940s. On the walls of the two reading rooms are 12-foot-high canvas murals by Frank DuMond that were originally exhibited at the Panama Pacific International Exposition in 1915 (see Figure A-12, Appendix A). They depict early Euro-American settlement of the West. In an alcove in the main entrance lobby is a bust of physician, lawyer, poet and library trustee Edward Robeson Taylor, who also served as dean of Hastings College of the Law and vice president of Cooper Medical College, one of the forerunners to Stanford University Medical School. Taylor was San Francisco mayor from 1907 to 1910. The bust, by Haig Patikian, was given to the library by James D. Phelan, another former mayor.

Gottardo Piazzoni was a Swiss-born artist who came to California in 1887 at the age of 15. He lived with his family on a ranch in Carmel Valley before moving to San Francisco four years later to study at the California School of Design under the painter Arthur F. Mathews. Piazzoni went to Paris in 1895, where he attended the École des Beaux Arts and the Académie Julian, returning to San Francisco in 1901 to teach. By the early 1920s, Piazzoni was known in the art press as the “dean” of San Francisco artists (O’Connor, 1997). In a 1928 letter to library board member Albert Bender, Piazzoni explained his intention for the murals, for ten of which he would be commissioned the next year, “It is simply to make something beautiful in unity with the architecture. To embellish it, instead of destroying the solidarity of its walls. In other words, not to make holes in the walls, nor with color hit one in the face as one ascends that beautiful

stairway. It is rather to elevate and inspire with something unique and original . . . a sort of symphonic whole" (Piazzoni, 1928).

Five of the Piazzoni mural panels, representing "the sea" (1931), are along the north side of the loggia; five panels, representing "the land" (1932), are along the south side. Each of the five sets of panels essentially forms one image, and may be viewed from close range and from the opposite balcony (see Figures 10A and 10B, pp. 56a and 56b; additional illustrations of the Piazzoni murals may be found in Appendix A). Four additional later panels, depicting "The Mountain," "The Forest," "Night," and "Dawn," were painted between 1933 and 1945 and stored in the basement of the library building until 1975, when they were installed at the east corners of the balcony, at the top of the staircase. All 14 murals are painted on canvas and glued to the walls. Each mural is approximately 12 feet high by 7.5 feet wide.⁸

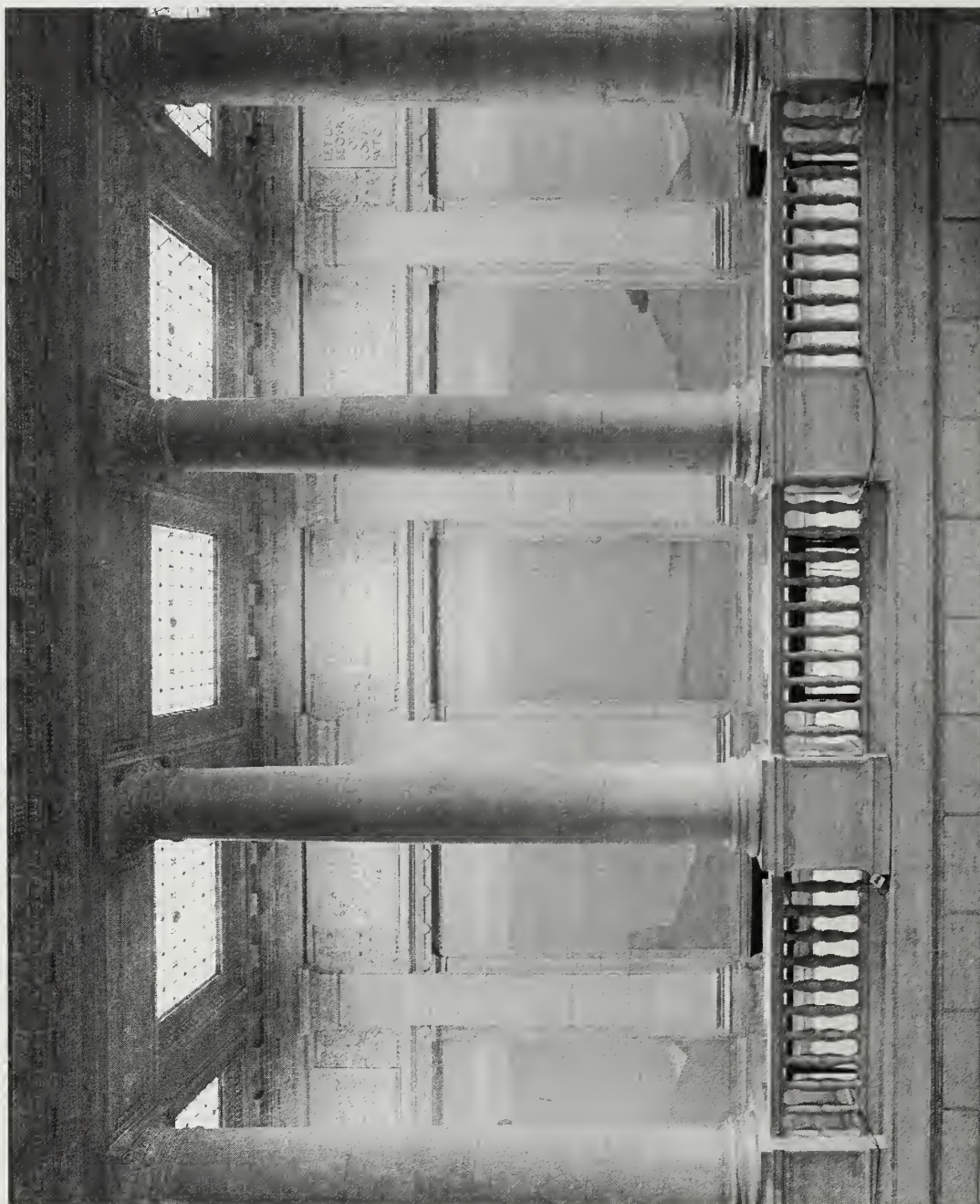
The original ten murals were commissioned for the library in 1929, financed by a subscription campaign by San Francisco citizens, and installed in 1932. They are affixed to the non-structural walls of the loggia (of a mortar developed to resemble travertine marble) with a starch paste and animal glue mixture. The four later panels were produced by Piazzoni as part of the Depression-era Public Works of Art Project, and are attached with a newer and stronger vinyl adhesive.

The Piazzoni murals were the subject of five evaluations by art conservators in 1996 and 1997. The results of those evaluations are summarized here. Two of the conservators, along with the project architect, Gae Aulenti, were named to a Piazzoni Murals Review Panel by the San Francisco Board of Supervisors in 1997 (Huston, 1998; Silver, 1998). Two other conservation reports (Alkons, 1997; Branchick, 1997) were commissioned earlier by the Asian Art Museum, and one (Rosenthal, 1996), by the museum and the San Francisco Art Commission.

The conservators found that the murals are generally in good condition, although they have suffered some incidental damage, particularly on the lower regions, as result of many years of exposure and public contact. Several scratches were noted, including some longer abrasions that may have been the result of books or equipment being transported through the loggia on carts. The paint has sustained some cracking. Some graffiti has been applied, and surface grime and dirt has also collected on the paintings; all are in need of cleaning. Generally, the murals depicting "the sea" appear to have sustained the most damage, perhaps because they are closest to the north-side elevator that was in use in recent years. Several small areas of retouching were also noted. Because of the murals' large expanses of muted, solid color, retouching is more visible than on some other art works.

The cotton canvas on which the murals was painted was not primed, although it was sized with glue, a process that stiffens the canvas and limits the paint from being absorbed by the canvas. Nevertheless, it appears that in some of the murals the oil-based paint has penetrated the canvas base. The paint was noted by all conservators to have been thinly applied, and in most panels the canvas can be seen through the paint application. In some panels it is also possible to see, through the paint, the pencil drawings that Piazzoni used to guide his work. There is

⁸ Dimensions were variously reported by conservators who inspected the murals in 1996 and 1997 to be between 12' x 6.5' and 14' x 7.5'. Dimensions were not verified for this report.



The Sea. North wall of Stair Loggia 290.

SOURCE: San Francisco Art Commission

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Figure 10A •

Piazzoni Mural - The Sea
North Wall



The Land. South wall of Stair Loggia 290.

SOURCE: San Francisco Art Commission

97.750E Asian Art Museum / ESA 970419 ■

Figure 10B •

Piazzoni Mural - The Land
South Wall

disagreement among the conservators' reports about the residual strength of the adhesive used to affix the murals, particularly the original ten. One conservator (Huston, 1997) states that the adhesive is likely near the end of its useful life and another (Silver, 1997) believes that the adhesive may last another 100 years.

In addition to the interior spaces listed in Article 10 (see p. 51 herein), a number of other interior areas of the old Main Library are important to the architectural integrity of the building as a historic resource, according to consultants who have reviewed the building. Since certification of the Main Library/Asian Art Museum FEIR, two evaluations of the old Main Library's historic architecture were conducted (Carey & Co., 1994; Page & Turnbull, 1998). The Carey report used as classifications Very Significant, Significant, Contributing, and Non-contributing. The Page & Turnbull report, prepared by the project's preservation architect, similarly classified interior spaces (rooms) and exterior elevations in four categories, in addition to those building features listed in Article 10: Preservation Zone 1 (highly important to the character of the building), Preservation Zone 2 (spaces that contribute to the eligibility of the building for the National Register of Historic Places), Preservation Zone 3 (spaces that contribute to the historic integrity of the building but are generally simple and utilitarian and were not originally intended for important public views or uses), and Non-Contributing (spaces altered such that they have lost their historic integrity or were originally so utilitarian as to not convey defining characteristics of the building). Page & Turnbull specifically evaluated the impacts of the currently proposed project (Page & Turnbull, 1998).

Table 3, p. 63 in the Impacts discussion, identifies interior spaces of the old Main Library building that are listed in Article 10 of the Planning Code or were designated Very Significant, Significant, or Contributory in the Carey report and Preservation Zone 1, 2, or 3 in the Page & Turnbull report, and the proposed disposition of those spaces as part of the Asian Art Museum project.

Expansion Space Site

The remainder of the block that comprises the project site consists of a vacant parcel, formerly occupied by a city office / library annex building (45 Hyde Street) demolished in November 1997; a paved parking lot between the old library and the former office building; and lawn along the south and west facades of the old library building. The lawn is within a stone base, or plinth, that increases in elevation along the Fulton Street side of the building with the gradual downward slope of the lot from west to east.

IMPACTS

SIGNIFICANCE CRITERIA

A project is normally found to have a significant effect on the environment if it will substantially disrupt or substantially adversely affect a property of historic significance or conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the Planning Code.

CEQA Section 21084.1 states that “a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” This section defines “historical resource” as one that is listed in, or determined eligible for listing in, the California Register of Historical Resources, and states that resources listed in a local register of historical resources “are presumed to be historically or culturally significant.” A “local register of historic resources” is defined in Public Resources Code Sec. 5020.1 as “a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.” A “substantial adverse change” is defined in Public Resources Code Sec. 5020.1 as “demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired.”

As noted, the preservation architect for the project has prepared a Preliminary Assessment that evaluates impacts of changes to the old Main Library building in relation to both the Secretary of the Interior’s *Standards for the Treatment of Historic Properties*, including the *Standards for Rehabilitation*, and the provisions of Article 10 of the San Francisco Planning Code, *Preservation of Historical, Architectural and Aesthetic Landmarks* (Page & Turnbull, 1998). Article 10, in its standards for granting of a Certificate of Appropriateness, states that work:

shall be compatible with the character of the historic district . . . and, in any exterior change, reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district (Section 1006.7(c)).

Additionally, Article 10 provides additional standards for Certificates of Appropriateness in the local Civic Center Historic District, stating that work:

shall (1) be compatible with respect to height, massing, fenestration, materials, color, texture, detail, style, scale and proportion, signage, landscaping and street furniture which may define the character of the historic district as described in Section 5 of this designating ordinance and in the Civic Center Urban Design Guidelines adopted by the City Planning Commission;⁹ and (2) preserve, enhance or restore, and not to damage or destroy, the exterior architectural appearance of the subject site, building, structure and object which is compatible with the character of the Historic District (Article 10, Appendix J, Section 9).

The National Park Service uses the Secretary of the Interior’s *Standards for the Treatment of Historic Properties* and the Guidelines for implementing the standards in reviewing federal projects that involve Historic Properties. There are four sets of standards, for Preservation, Rehabilitation, Restoration, and Reconstruction. Of the four, the *Standards for Rehabilitation* are most applicable to projects involving renovation and adaptive reuse of historic buildings, such as the Asian Art Museum project. The Park Service and the State Office of Historic

⁹ These guidelines have been published in draft form in the Planning Department’s Draft Civic Center Study (October 1994), but are not yet adopted.

Preservation also use the Secretary's *Standards for Rehabilitation* and the accompanying Guidelines in determining eligibility of rehabilitation projects for federal tax credits.¹⁰

IMPACT ASSESSMENT

The project would alter the existing exterior facades of the old Main Library building, including the principal Larkin and Fulton Street facades. With the exception of installation of the mechanical penthouse and screen and removal of the statues on the Larkin Street facade, most exterior alterations on principal facades would not be substantial. The project would also demolish most of the interior of the old Main Library building, including a number of spaces identified as Exceptionally Significant Interior Spaces in the Planning Code. In sum, these effects would constitute a substantial adverse change to the old Main Library building, an identified historic architectural resource, and would therefore result in a significant adverse impact on historic architectural resources. The proposed changes are described in detail below.

The project site is located within three historic districts: local, National Register, and National Historic Landmark. Neither exterior nor interior changes would alter the fundamental relationship between the old Main Library building and City Hall, which, according to their nomination forms and case reports, is the key element unifying each of the three districts. For example, the 1974 nomination form for the National Register historic district – the first prepared for the Civic Center – states:

The criteria on which the buildings are judged, then, must be the degree to which each enhances the group without distracting from the City Hall. These qualities are achieved through a harmony of color, material, scale, size, texture, rhythm, and style. Within these constrictions the buildings achieve individual interest through the imaginative manipulation of the elements. These are the criteria on which the architects of the buildings would have wanted them to be judged (Corbett, 1974; p. 8-c5).

Nevertheless, the National Park Service and the State Historic Preservation Officer believe that effects on the National Register historic district and the National Historic Landmark District would be significant because, they maintain, changes to the old Main Library building could result in the building no longer being deemed contributory to the districts.

Regarding effects on the local Civic Center Historic District, Appendix J of Planning Code Article 10 makes the same statement as the National Register nomination form regarding the

¹⁰ There are two slightly different versions of the Secretary's Standards for Rehabilitation. The most recent version was prepared in 1992 as part of a revision of all four standards, and was codified in 1995 as 36 CFR Part 68. A 1990 version of the Standards for Rehabilitation, codified as 36 CFR Part 67, is mandatory for use in projects seeking to qualify for federal tax credits for renovation of historic properties. There are no substantive differences between the two, only minor changes in wording. This report uses the 1992 Standards for Rehabilitation.

relationship of other Civic Center buildings to City Hall. The project would not alter this fundamental relationship. The Planning Commission and Board of Supervisors could choose to retain the old Main Library building as Contributory to the local historic district, or could determine that the Appendix J need be revised to designate the old Main Library building as Contributory/Altered, or as Noncontributory. No such action is proposed at this time.

The analysis of impacts that follows is based in part on the Page & Turnbull Preliminary Assessment (Page & Turnbull, 1998). The full Page & Turnbull report is included in Appendix A of this SEIR, p. 122.

SEISMIC UPGRADE

The principal features of the seismic upgrade would be the installation of a base isolation foundation system and concrete shear walls. Base isolation would require construction of a new concrete slab and raising the flooring of the basement (lower level) by two to three feet to accommodate the isolators. It would also include construction of a moat around the building to accommodate building sway in an earthquake. Impacts on historic architectural resources would be limited. Installation of the new foundation would not affect important interior spaces and generally would not be visible. The moat would be screened by plantings and, in non-planted areas, metal plates. The proposed seismic upgrade would protect this historic resource in the event of an earthquake.

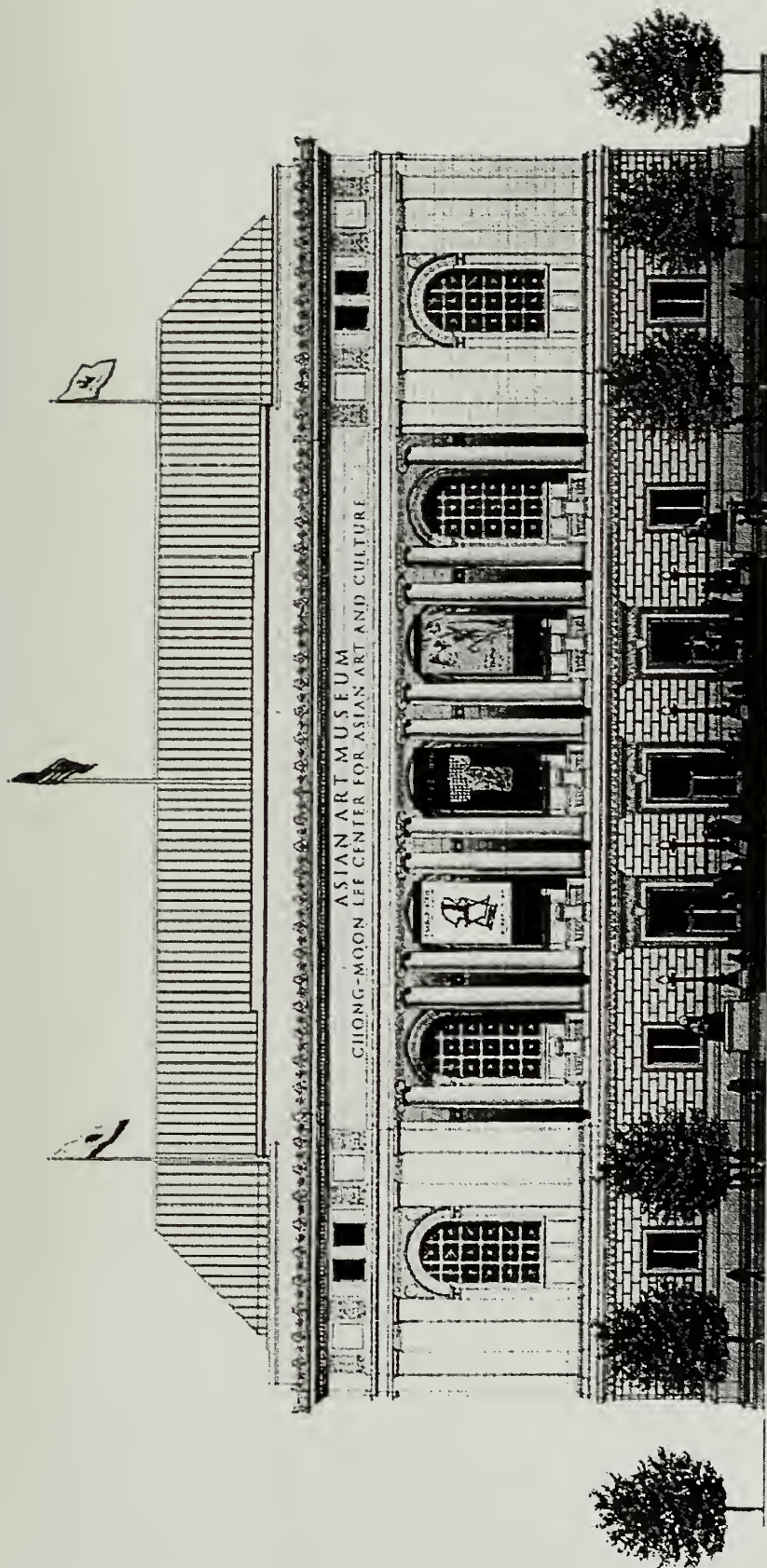
To avoid disturbance of principal exterior facades, shear walls would be constructed in the four corners of the building by removal of the interior walls, which would then be rebuilt over the shear walls. To construct the shear walls within the Great Hall (Room 200) with minimal disturbance to this Exceptionally Significant Interior Space, the existing exterior brick would be removed on all four sides and concrete walls constructed; shear wall construction would also require removal of the east wall of the second floor stair loggia (Room 290), also an Exceptionally Significant Interior Space. The brick would not be reused. Within the proposed Central Court, the brick would be replaced with a waxed plaster finish, while a stucco-like material would replace the brick on portions of the existing brick walls that would remain exterior walls. The smooth, monolithic surface of the plaster would not be compatible in size and scale with the existing brick, which is by nature formed by much smaller compositional units. However, the brick is not of utmost importance to the character of the building. (Page & Turnbull, 1998, p. 6). Further, much of the exterior brick, until the recent demolition of the 45 Hyde Street building, was obscured behind that building. In addition, future phases of the project would obscure the view of these walls.

As noted in the Project Description, p. 25, the walls of the second floor stair loggia require seismic strengthening. The museum believes that work required to perform this seismic upgrade could damage the 14 Piazzoni murals located on the loggia walls if they were left in place during construction. The museum also believes its design for the project would be compromised if the murals were retained (see Second Floor Stair Loggia and Murals, p. 65). For these reason, and because the museum believes the murals would be more appropriately displayed in another location, the museum plans to remove the Piazzoni murals as part of the project.

EXTERIOR CHANGES

As described in Chapter II, Project Description, the building's main entrance would remain on Larkin Street. A hipped (sloped) roof penthouse / screen would rise approximately 16 feet above the existing parapet to screen the new rooftop mechanical equipment. The new mechanical equipment is needed because the heating, ventilation, and air conditioning (HVAC) requirements of the Asian Art Museum are more stringent than those of the library. According to the project architect, the building's historic nature requires that rooftop mechanical equipment occupy more area on the roof than would otherwise be the case to minimize the amount of ductwork extending horizontally through the building and avoid, as much as possible, removal of historic ceilings. Because the mechanical equipment cannot be clustered out of view, the penthouse and screen are proposed to obscure the equipment from ground-level views. Figure 2, p. 30, shows the proposed Larkin Street elevation (lions are not shown). Figure 10C presents an architect's rendering of the Larkin Street facade, and Figure 10D, p. 60b, shows a visual simulation of the proposed project and the New Main Library across Fulton Street.

The penthouse would be three feet taller than the existing mechanical equipment screen. It would extend almost the entire width of the building's Larkin Street facade and at its highest point would be set back about 20 feet from this facade, compared to more than 50 feet for the existing screen. The 16-foot-tall hipped roof / screen would be taller on the west (Larkin Street) side of the roof than on the Fulton and McAllister Street sides, which would each have a 7-foot-tall mechanical screen. Together, the hipped-roof penthouse and screen would alter the original

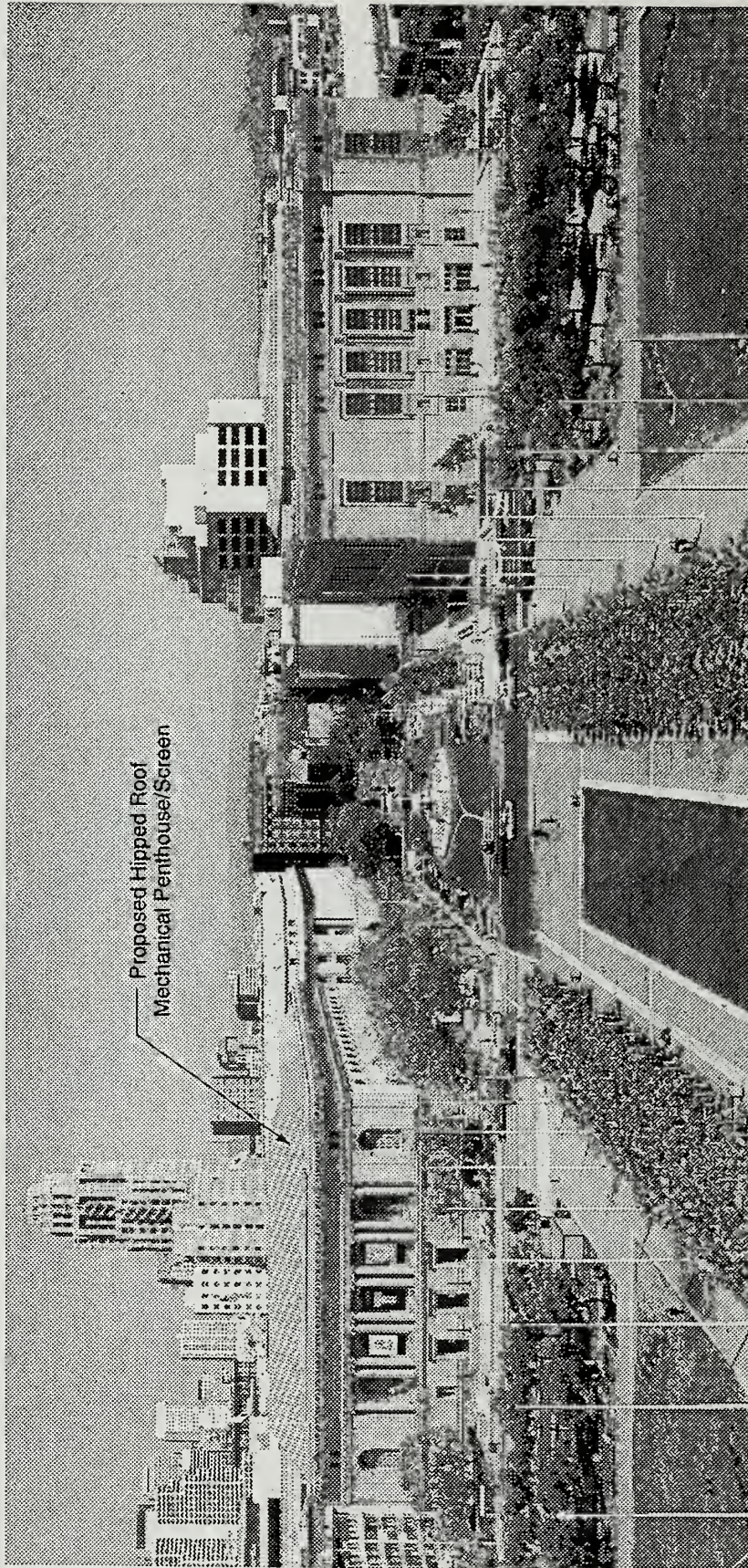


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Figure 10C •

Architect's Rendering of Larkin Street Facade

SOURCE: HOK / LDA / RWA



Proposed Asian Art Museum

New Main Library

SOURCE: HOK / LDA / RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 10D •
Visual Simulation of Asian Art Museum and
New Main Library

design of the old Main Library building and, because their heights would vary, would disrupt the existing regularity in the building's elevations (Page & Turnbull, 1998, p. 1). According to the State Historic Preservation Officer, it also "would create a false historic appearance, transforming the building from a neo-classical structure based on Italian architectural precedent to a building in the French Baroque style" (Abeyta, 1998).

The hipped-roof penthouse / screen would be visible above the west end bay of the Fulton Street facade, and a 7-foot-tall hipped-roof screen, set back 10 feet from the Fulton Street facade, would extend along the remainder of the building's south wing. Figure 3, p. 31, shows the proposed Fulton Street elevation.

Addition of the mechanical penthouse and screen would be most apparent in mid-range views, such as from Civic Center Plaza, of the two principal facades, on Larkin and Fulton Streets. The hipped roof would affect primary architectural features of the old Main Library – principal and secondary elevations – that are compatible with the character of the historic district. Although it could be considered compatible with other buildings in the district that have hipped roofs, such as the California State Building, the Old Federal Building, the new San Francisco Civic Center Courthouse, and the Opera House and Veterans' Building, the new roof line is not a historic feature of the old Main Library.

The proposed removal of the statues on the Larkin Street facade would eliminate a distinctive feature that characterizes the old Main Library building (Page & Turnbull, 1998, p. 4).

Installation of four new doors on the Fulton Street facade and construction of the outdoor dining terrace would alter a principal elevation of the old Main Library building. The new doorways, two of which would be required for emergency egress and two of which would serve the proposed cafe and lounge, would be compatible with the existing building and the local Civic Center Historic District "in materials, scale and proportion, and details," as required by Article 10, but would alter existing fenestration (Page & Turnbull, 1998, pp. 2-3). The dining terrace would be noticeable, but "would not upset the fundamental relationship between the building and the landscape" (Page & Turnbull, 1998, p. 3).

Replacement of the existing glazing in the two-story windows and installation of new translucent windows behind the existing windows on the principal Larkin and Fulton Street facades would alter the visual appearance of these facades, although the new glazing would be similar in color and reflectivity to the existing, and the approach to these windows would avoid obtrusive changes to exterior glazing (Page & Turnbull, 1998, p. 3). The proposed emergency staircase inside the Fulton Street reading room would not be readily visible from the outside behind the new translucent white glass.

As noted in the discussion of seismic upgrade impacts, p. 60, the project would also remove the exterior brick walls on all sides of the Great Hall and in the existing north and south light courts. The exterior brick walls within the two light courts, which would become part of the new Central Court, would be replaced with a waxed plaster finish.

Construction of the proposed glass-enclosed stair or escalators along the north wall of the old Main Library's south wing would alter the appearance of this secondary facade, and would not adversely affect the building's character, in that they would not destroy existing elements that

characterize the building (Page & Turnbull, 1998, p. 7). Figure 5, p. 33, shows the McAllister Street elevation.

With regard to alterations to the secondary McAllister Street facade, the installation of opaque gray-green spandrel glass and emergency exit doors in the McAllister Street windows would alter the appearance of this secondary facade. Because it would differ so much from the existing clear glass, the new glazing would substantially alter the appearance of the windows on the McAllister Street facade. The new exit doors would not adversely affect the character of the building or its relationship to the historic districts, in that most of the north facade would be preserved (Page & Turnbull, 1998, p. 5).

The extension of the old Main Library building's lower level onto a portion of the 45 Hyde site, at a height of about 12 feet, would be finished with blank panels of synthetic stucco. While clearly differentiated from the existing building, as recommended in the Secretary of the Interior's *Standards for Rehabilitation*, the new single-story facade would not be compatible with the old Main Library in terms of materials or the blank face it would present to the street (Page & Turnbull, 1998, p. 7).

INTERIOR CHANGES

Some of the important interior spaces would be retained in the Asian Art Museum. The Monumental Staircase from the main entrance to the Great Hall would remain, and the Great Hall would be converted to a space for special exhibitions, lectures, and special events. The two rooms that make up the main entrance on Larkin Street would be preserved, as would the north-south corridor inside the entrance hall and vestibule. Table 3 identifies important historic architectural interior spaces and the proposed disposition of those spaces under the project. Figures 6 and 7, pp. 37 and 38, identify important interior spaces by room numbers, which are provided in parentheses in the text.

Monumental Staircase, Great Hall, and Reading Rooms

The Monumental Staircase would no longer be the primary entrance to the interior of the museum, as it was in the library. Visitors would enter the exhibit area of the museum at a control point near the southeast corner of the Central Court, from where they could use the new glass-enclosed stairway (or escalators) or take an elevator to the second- and third-floor galleries. Alternatively, visitors could enter the second-floor galleries via the existing Monumental Staircase and reach the third floor by other stairs or elevators. This change in function of the Monumental Staircase and other circulation patterns would substantially alter the primary circulation sequence that is a central characteristic of the original Beaux Arts "parti" (Page & Turnbull, 1998, p. 18).

As noted under seismic upgrade impacts, p. 60, the project proposes to retain the existing plaster finish in the Great Hall by installing concrete shear walls around the outside of this portion of the building, thereby avoiding the need to open the interior walls. A new elevator adjacent to the proposed glass-enclosed stair or escalators would intrude approximately one foot into the Great

TABLE 3
RATINGS OF AND EFFECTS ON HISTORIC ARCHITECTURAL INTERIOR SPACES

Space	Article 10 ^a	Rating of Interior Space		
		Page & Turnbull ^a	Carey & Co. ^a	Disposition under Project
<u>Lower Level (Basement)</u>				
Mechanical Room (10)		NR	Contributing	Demolish
Corridors (90, 91)		NR	Contributing	Demolish
South Stacks, Levels 1-2 (ST2)		NR	Significant	Demolish
Misc. Rooms (2, 2A, 6, 7)		NR	Contributing	Demolish
<u>Ground Floor</u>				
Entrance Vestibule (191)	√	b	Very Significant	Retain
Entrance Hall (101)	√	b	Very Significant	Retain
Corridor (190)	√	b	Very Significant	Retain
Monumental Staircase (S101)	√	b	Very Significant	Retain
Elevator Lobbies (192, 193)	√	b	Very Significant	Demolish
Elevator (E2)		Zone 1	Very Significant	Demolish
Fulton Lobby, Vestibule (198A, 198)		Zone 1	Very Significant	Convert to cafe dining room
Corridor (190A)		Zone 1	Significant	Demolish (most)
Corridor (190B)		Zone 1	Significant	Demolish (most)
Corridor (194)		Zone 1	Significant	Demolish
Restrooms (108A, 108B, 122)		Zone 1	Significant	Demolish
Stairs and Vestibule (S102, S104, 112, 120)		Zone 1	Significant	Demolish
Offices & Vestibules (104, 105, 106, 107A)		Zone 2	Significant	Demolish
Stacks, Levels 1-3 (ST1)		Zone 2	Significant	Demolish
Children's Room and Office (114, 116)		Zone 2	Significant	Demolish
Fine Arts Dep't. and Office (118, 118B)		Zone 2	Significant	Demolish
South Stacks, Levels 3-4 (ST2)		Zone 2	Significant	Demolish
Lurie Room (102)		Zone 2	Contributing	Remodel; divide for other uses. [S]
Staff Room (103)		Zone 3	Contributing	Remodel [S]
Offices (107B, 109)		Zone 3	Contributing	Demolish
Business Department (119)		Zone 3	Contributing	Remodel; convert to gallery [S]
Offices, Storerooms (117-117D)		Zone 3	Contributing	Demolish; construct museum store
Sheet Music Dep't. & Office (196A&B)		Zone 3	Contributing	Demolish
Corridor (197) and Stair (S103)		Zone 3	Contributing	Demolish
North and South Light Courts		Zone 3	NR	Enclose; convert to Central Court
<u>Second Floor</u>				
South (Fulton St.) Reading Room (210)	√	b	Very Significant	Divide into 2 levels (add new floor)
West (Larkin St.) Reading Room (201)	√	b	Very Significant	Divide into 2 levels (add new floor)
Reading Rooms (202, 203, 218)	√	b	Significant	Divide into 2 levels (add floor) [S]
Corridor (291A)	√	b	Very Significant	Retain
Great Hall (200)	√	b	Very Significant	Retain; elevator would protrude
Main Stair Hall [Loggia] (290)	√	b	Very Significant	Demolish wall panels containing Piazzoni murals, remove murals; retain columns, base and entablature; install new columns; retain inner columns, floor, and ceiling; demolish east wall

(continued)

(101) = Room Number; figures 6 and 7, pp. 37 and 38, identify important interior spaces by room numbers.

[S] = Shear wall to be constructed within this space, necessitating removal of interior walls.

NR = Not rated Zone 1, 2, or 3 (Page & Turnbull) or Very Significant, Significant, or Contributory (Carey).

^a √ = Space identified as Exceptionally Significant Interiors Space in Article 10. Page & Turnbull Preservation Zone ratings: Zone 1 - highly important to the character of the building; Zone 2 - spaces that contribute to the eligibility of the building for the National Register of Historic Places; Zone 3 - spaces that contribute to the historic integrity of the building but are generally simple and utilitarian and were not originally intended for important public views or uses. Carey classifications are similar, but use terms Very Significant, Significant, and Contributing.

^b Page & Turnbull did not separately rate spaces listed in Article 10, which confers City-adopted recognition of historic architectural importance.

TABLE 3 (continued)
RATINGS OF AND EFFECTS ON HISTORIC ARCHITECTURAL INTERIOR SPACES

Space	Article 10 ^a	Rating of Interior Space		
		Page & Turnbull ^a	Carey & Co. ^a	Disposition under Project
<u>Second Floor</u> (continued)				
Piazzoni murals	√	b	Very Significant	Remove
Monumental Staircase (S101)	√	b	Very Significant	Retain (but see 290)
Stairs and Vestibule (S102, S104, 212)		Zone 1	Significant	Demolish
Corridors (291B, 291C)		Zone 2	Significant	Demolish; incorporate into 201
Stacks, Levels 4-7 (ST1)		Zone 2	Significant	Demolish
Hall (299)		Zone 3	Significant	Demolish
Stair (S201), Passage (292)		Zone 3	Contributing	Demolish
Offices (204, 206, 207, 208, 213, 216)		Zone 3	Contributing	Demolish
Closets, Storage (206A, 207A, 209, 213A, 216A, 292A)		Zone 3	Contributing	Demolish
Corridor (293) and Stairs (S201, S301)		Zone 3	Contributing	Demolish
Miscellaneous (211, 217)		Zone 3	Contributing	Demolish
<u>Third Floor</u>				
Periodical Room (301)		Zone 1	Very Significant	Demolish
Elevator Lobby (390)		Zone 1	Very Significant	Demolish
Corridor (392)		Zone 1	Very Significant	Demolish
Storage (392A)		Zone 1	Very Significant	Demolish
Restrooms, Retiring Room (308, 319, 321)		Zone 1	Very Significant	Demolish
Elevator (E3)		Zone 3	Very Significant	Demolish
Stairs (S102, S104)		Zone 1	Significant	Demolish
San Francisco History Room (320)		Zone 2	Significant	Demolish
Archive (322, 324)		Zone 2	Significant	Demolish
Special Collections (318D)		Zone 2	Significant	Demolish
Offices (302, 318A)		Zone 2	Significant	Demolish
Miscellaneous (304, 315, 394)		Zone 2	Significant	Demolish
Corridor (393)		Zone 2	Contributing	Demolish
Office (318B)		Zone 3	Significant	Demolish
Miscellaneous (306, 312, 314, 318C)		Zone 3	Significant	Demolish
Lounges (303, 305)		Zone 3	Contributing	Demolish
Conference Room (323)		Zone 3	Contributing	Demolish
Work Room / Storage (325)		Zone 3	Contributing	Demolish
Offices (310A-C, 316A&B)		Zone 3	Contributing	Demolish
Closets, Storage (303A, 316C, 325A-325B, 327-327B, 394A)		Zone 3	Contributing	Demolish
Corrid. (310C,395,397); Stairs (S103,S301)		Zone 3	Contributing	Demolish
Lockers (309, 311)		Zone 3	Contributing	Demolish
Kitchen (307)		Zone 3	Contributing	Demolish

(101) = Room Number; Figures 6 and 7, pp. 37 and 38, identify important interior spaces by room numbers.

[S] = Shear wall to be constructed within this space, necessitating removal of interior walls.

NR = Not rated Zone 1, 2, or 3 (Page & Turnbull) or Very Significant, Significant, or Contributory (Carey).

^a √ = Space identified as Exceptionally Significant Interiors Space in Article 10. **Page & Turnbull** Preservation Zone ratings: Zone 1 - highly important to the character of the building; Zone 2 - spaces that contribute to the eligibility of the building for the National Register of Historic Places; Zone 3 - spaces that contribute to the historic integrity of the building but are generally simple and utilitarian and were not originally intended for important public views or uses. **Carey** classifications are similar, but use terms Very Significant, Significant, and Contributing.

^b Page & Turnbull did not separately rate spaces listed in Article 10, which confers City-adopted recognition of historic architectural importance.

SOURCE: Page & Turnbull, 1998; Carey & Co., 1994

Hall; this elevator would be linked to the second- and third-floor galleries by a pedestrian bridge over the Central Court. Other finish and trim materials would be saved and remounted, as feasible, but some may be replaced. Two other pedestrian bridges at the second floor would connect the Great Hall with the proposed galleries in the north and south wings of the old Main Library building.

The two double-story second floor reading rooms (Rooms 201 and 210) and the three smaller corner rooms (Rooms 202, 203, and 218), would be converted to gallery or, in the case of one or more of the smaller rooms, office space, and a new third floor would be installed within each of these five rooms, that is, throughout the second floor, resulting a total of four floors within the building. The decorative beamed ceilings in the two large rooms would be preserved, and certain trim and finish materials would also be retained, where feasible; bookshelves would be removed, and other finish materials would be replaced or eliminated. In the two large reading rooms, the new third floor would be set back about five feet from the windows. With installation of the new third floor level, the five rooms would lose the effect of the space created by their existing two-story height (see Figures 10E and 10F, pp. 65a and 65b). Installation of the new third floor level would adversely affect these Exceptionally Significant Interior Spaces, as designated in Planning Code Article 10, Appendix J, by fundamentally altering the existing proportions of the rooms. This change would be visible from the exterior, at least under certain lighting conditions. However, the new floor potentially could be removed and the spaces restored in the future (Page & Turnbull, 1998, p. 12).

The north wall of the Fulton Street reading room (Room 210) would be partially demolished through removal of existing arched windows into the existing light court and cutting of 14-foot square openings to the proposed Central Court at the second floor and the new third floor. This would further alter this existing Exceptionally Significant Interior Space, as identified in Planning Code Article 10, Appendix J. In addition, a new emergency exit stairway to be installed in the Fulton Street reading room would be constructed within this room.

In addition to installation of a new third floor level, the project would include demolition of parts of the existing east walls of the Larkin Street reading room (Room 201) to enlarge this proposed gallery, incorporating existing corridors (Rooms 291B and 291C) north and south of the loggia. This change would alter the existing rectangular form of this room, and would eliminate the existing corridors.

Second Floor Stair Loggia and Murals

On the second floor, the panels in the unreinforced masonry walls that contain the Piazzoni murals in Balcony 290 (stair loggia), an Exceptionally Significant Interior Space, would be demolished, as would the east wall of the loggia (see Seismic Upgrade, p. 60). The project would retain the existing decorative, non-structural columns between the panels, the wall base and the entablature above, including inscriptions. New structural columns would be added (the existing inner columns flanking the Monumental Staircase would remain as at present, as would the floor and ceiling). Cutting large openings in the walls of the loggia would significantly alter the space in the stair loggia and the original scheme for admitting daylight into the this area and the Monumental Staircase (Page & Turnbull, 1998, p. 13), which now consists of indirect lighting from skylights. With the new openings, exterior light would enter the loggia from the sides as well. The museum would install display cases in the newly created wall openings.



NOTE: New third floor shown cut away to reveal existing second floor below.
Fulton Street windows are at right.

SOURCE: HOK / LDA / RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 10E●

Visual Simulation of Second Floor
Fulton Street Reading Room (Room 210),
Looking East

The project would demolish large portions of the interior walls of the building's north and south wings, creating new openings from the Fulton Street reading room and the former stacks into the Central Court. Together, the openings in the loggia and reading room walls would allow views from galleries in either wing across the entire the museum, through the loggia, to the gallery on the other side. Figure 11 depicts the proposed design scheme for the second-floor loggia. The proposed opening in the loggia and the galleries is also shown in Figures 9 and 9A, p. 41 and 41a. Figures 11A and 11B, pp. 67a and 67b, present visual simulations showing the proposed loggia.

As noted in the project description chapter and under seismic upgrade impacts, p. 60, the Asian Art Museum proposes to remove the 14 Piazzoni murals from the loggia prior to construction. The murals are not proposed to be reinstalled in the old Main Library building. Removal of the Piazzoni murals would displace from the old Main Library building works of art that, in the view of several experts, are considered integral to the building (see also the discussion of the Piazzoni murals in Section III.A, Setting, p. 55), and would remove "distinctive features and examples of craftsmanship which contribute to the significance of the building" (Page & Turnbull, 1998, p. 13).

Conservators who reviewed the murals were divided in their opinions as to the extent of damage that would be sustained by the murals in removing them from the walls. Of five conservators' reports reviewed for this analysis, three concurred in the conclusion that the murals could be safely removed from the walls, albeit with some minor damage, assuming that great care were taken in the process (Branchick, 1997; Alkons, 1997; Huston, 1997). Two conservators concluded that removal would likely cause more serious damage (estimated loss of between 7 percent and 20 percent of the surface) as the canvas was pulled away from the wall (Rosenthal, 1996; Silver, 1997). According to one conservator, damage would be likely even if the supporting wall panels were cut away with the murals intact and the murals removed later (Silver, 1997). The conservators generally noted that the newer, vinyl adhesive on the four murals installed in 1975 at the west end of the stair loggia would prove more of an obstacle to removal than would the older glue/paste adhesive used on the ten murals installed on either side of the loggia in the 1930s. Because the color palette of the murals is muted, relatively minor damage could be noticeable (Rosenthal, 1996; Silver, 1997).

Although not all the conservators addressed this issue, two of the conservators (Rosenthal, 1996; Silver, 1997) argued that the Piazzoni murals were created specifically for the Main Library and are integral to the architecture of the building, and recommended against removal of the murals from the building from the perspective of art preservation and conservation. Rosenthal stated, "Removal of the murals for reasons less than saving them from destruction would raise serious ethical questions." Both Rosenthal and Silver recommended altering the Asian Art Museum's design scheme to retain the murals in place, stating that preservation would be possible during construction by enclosing the murals in solid, climate-controlled boxes.

A third conservator (Huston, 1997), while acknowledging the murals' conception for the old Main Library building, stated that exhibiting them as a set elsewhere, like "windows in an



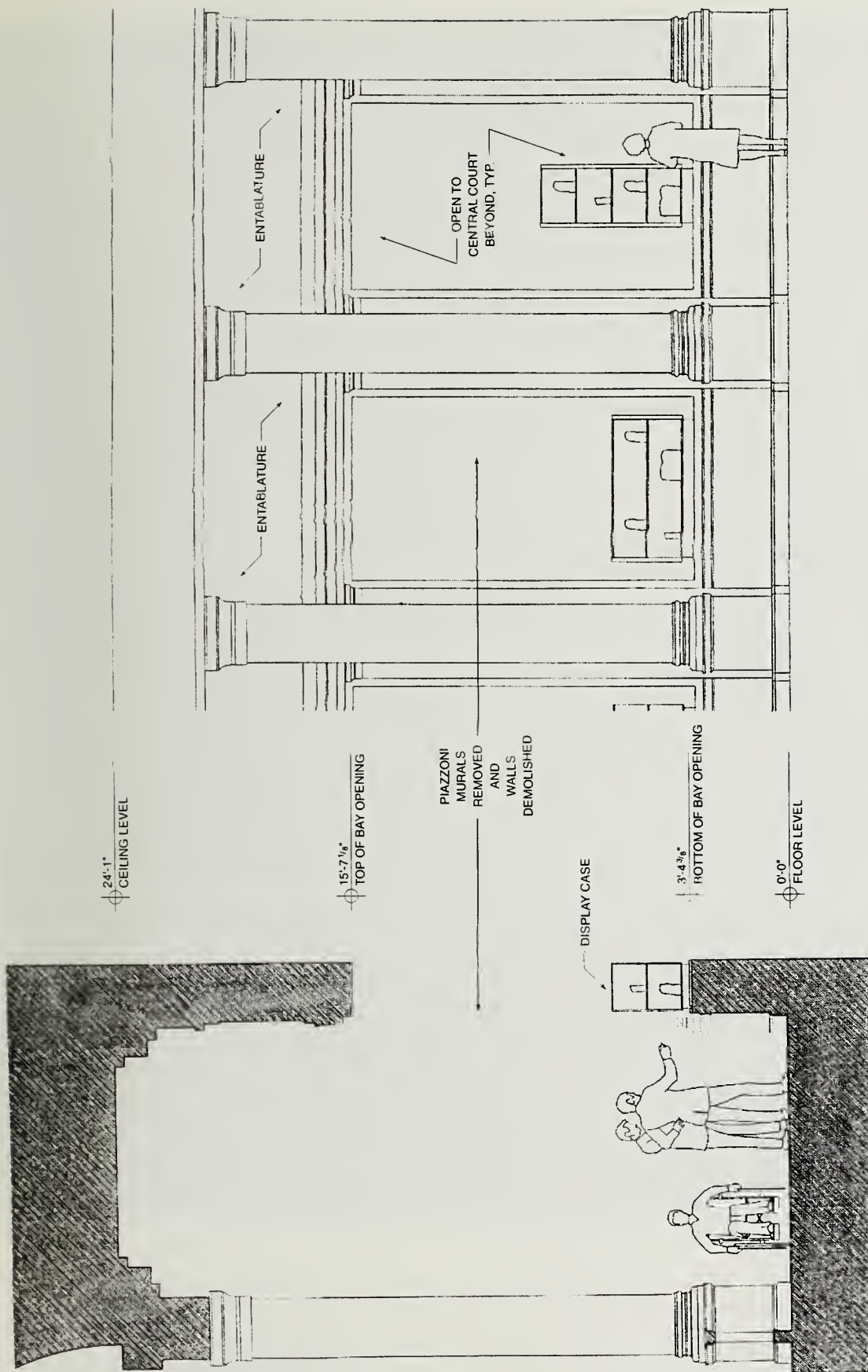
NOTE: New third floor shown cut away to reveal existing second floor below.
Larkin Street windows are at left.

SOURCE: HOK / LDA / RWA

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Figure 10F●

Visual Simulation of Second Floor
Larkin Street Reading Room (Room 201),
Looking North



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Figure 11

Proposed Second Floor Loggia

SOURCE: HOK/LDA/RWA



NOTE: Display cases shown in wall openings at current location of Piazzoni murals.

SOURCE: HOK/LDA/RWA

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Figure 11A●

Visual Simulation of Second Floor
Stair Loggia (Room 290)



SOURCE: HOK/LDA/RWA

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Figure 11B●

Visual Simulation of Monumental
Staircase (S101) and Second Floor
Loggia (290), Looking West

architectural setting” as they were originally conceived, would be acceptable. The project architect, Gae Aulenti (1997) also argued for removal, stating that the murals could be damaged during construction due to vibration and exposure to the elements.

The Asian Art Museum chooses not to reinstall the murals because it believes that:

If the Piazzoni paintings remained in place, the design itself would be compromised. The design’s underlying principle and aesthetic is the unity of space created through light and visibility from galleries on either side of and through the loggia, creating a dynamic effect of movement and energy. Exhibition options, particularly on the loggia level where the paintings flank the grand staircase, would be severely constricted, as well. Exhibition concepts for the loggia openings include displaying Ming dynasty scrolls, Indian stone sculpture and the Museum’s exquisite jade collection illuminated by natural light. The paintings’ permanence and size would limit the Museum’s ability to display its outstanding collection on a rotating basis and host the significant exhibitions of Asian culture, heritage and art for which it is known (Asian Art Museum, 1997; Killoran, 1998).

The conservator selected by the Asian Art Museum to serve on the Board of Supervisors’ review panel has stated that “the murals must be removed for their safety and cannot be preserved *in situ* during construction.” Reasons cited include the loss of environmental protection once the exterior walls are removed; potential impacts on the travertine walls due to vibration required for demolition of the brick exterior walls; and potential damage to the murals during the installation of seismic bracing, if the murals were retained in place during the construction (Huston, 1997).

A preservation architect who reviewed the project on behalf of the Board of Supervisors’ Piazzoni Review Panel has stated that seismic strengthening of the loggia could be accomplished without removing the faux travertine panels on which the murals are mounted by installation of structural members between the panels and the exterior brick walls, which would allow the murals to remain in place (Judd, 1997).

The museum is considering several potential relocation sites for the Piazzoni murals, including the new state office complex, which combines a new building and renovation of the historic California State Building at 350 McAllister Street, diagonally across the street from the old Main Library. According to the museum, the potential relocation sites would offer free public access to the murals. No decision has been made regarding a relocation site. The Asian Art Museum Foundation has agreed to provide \$250,000 towards restoration of the murals if they are moved. Assuming they are not damaged in the removal process, the murals could be mounted on panels and reinstalled in the old Main Library at a later date, although this would not recreate the existing permanent installation.

The Board of Supervisors, on December 15, 1997, passed a resolution urging the Asian Art Commission to remove the Piazzoni murals from the old Main Library building prior to the start of construction on the Asian Art Museum project and to explore options for relocation and display of the murals, subject to completion of environmental review.

The project would also remove the two large duMond murals in the second floor reading rooms. The duMond murals are proposed for relocation by the museum, in conjunction with the San Francisco Art Commission. The duMond murals, unlike the Piazzonis, were not created for the old Main Library, but were moved there after original installation at the Panama-Pacific Exposition. Unlike the Piazzoni murals, the duMond murals depict action and are painted in more a palette that uses more contrasting colors. Minor damage would therefore likely be easier to repair.

Third Floor

Changes to the existing third floor (proposed fourth floor), including demolition of nearly the entire interior and construction of new office space and a museum research library, would adversely affect important interior spaces, including the former Main Library periodical room (Room 301) and elevator lobby (Room 390) (Page & Turnbull, 1998, p. 17). There are no Exceptionally Significant Interior Spaces, as identified in Planning Code Article 10, Appendix J, on the existing third floor.

Other Exceptionally Significant Interior Spaces

Creation of the new Central Court would adversely affect ground-floor Elevator Lobbies (192 and 193), which are designated Exceptionally Significant Interior Spaces. These lobbies would be demolished and the space incorporated into the new Central Court. According to the project architect, the existing elevators meet neither program needs nor the current requirement of the Americans with Disabilities Act (ADA).

Other Exceptionally Significant Interior Spaces would be retained, including the Main Entrance Hall (101; see Figure 11C) and Vestibule (191), Public Corridor 190, Public Corridor 291A, and most of the Great Hall (200), discussed above, with the exception of the new elevator that would encroach approximately one foot into this room. The bust of Edward Robeson Taylor would be removed from Room 191.

Other Interior Spaces

A number of other interior spaces with historic architectural merit would be demolished. Table 3, p. 63, identifies these historic architectural interior spaces and the proposed disposition of those spaces under the project.

Conversion of the existing Fulton Street entry lobby to a dining room, including closure of the Fulton Street entrance and installation of a new glazed partition, would not destroy the sense of space in this area and would be considered a partially reversible change that could be reversed in the future, and likely would not adversely affect this room (Page & Turnbull, 1998, p. 10).

The existing seven-story library stacks would be demolished and new museum space – primarily galleries – would be constructed. The stacks would be rebuilt as four floors to match the remainder of the building, including the proposed new third floor in the existing second-story reading rooms. The stacks are a distinctive architectural feature of the old Main Library, but were not originally publicly accessible, and could therefore be considered a secondary space (Page & Turnbull, 1998, p. 11). They are not listed in Article 10.

EXPANSION SPACE

Subject to funding, construction of the proposed auditorium/theater, with two stories of additional museum gallery and office space, would occur atop the proposed lower level expansion about 12 feet above grade at the 45 Hyde Street site. The auditorium/theater / office addition would



NOTE: Corridor 190 is visible at right; Larkin Street doorway is through vestibule at left

SOURCE: HOK / LDA / RWA

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Figure 11C.
 Visual Simulation of Larkin Street
 Entry (Room 101), Looking North

become the primary Hyde Street facade of the museum, obscuring the eastern wall of the Great Hall. Like the lower level addition in the project, the auditorium/theater addition would be set back about 5 feet from Hyde Street. The addition would also be set back from the existing Fulton Street wing of the old Main Library building to accommodate the museum's proposed glass-enclosed stair or escalators. As such, the theater addition would be clearly differentiated from the existing building. The auditorium/theater addition would be three stories tall above the lower level, and the entire addition, including the lower level, would be about 80 feet tall (above grade) to match the height of the old Main Library building at Hyde Street.

No formal design has been prepared for the auditorium/theater addition at 45 Hyde Street. It is anticipated that the auditorium/theater addition could be finished in gray granite or precast concrete panels, intended to be similar in color and texture to the old Main Library building and most other monumental structures in the Civic Center. As with alterations to the existing old Main Library building, the auditorium/theater addition would be required, under Article 10, to be compatible with the character of the historic district. Because design plans for the auditorium/theater addition are conceptual at this time, a separate Certificate of Appropriateness would be required at such time as the design were more fully developed.

According to the Secretary of the Interior's *Standards for Rehabilitation*, new additions to historic buildings should be designed and constructed so that the character-defining historic materials, features, and spatial relationships of the property are not destroyed. New construction should also be clearly differentiated from the old, and yet should be compatible with the massing, size, scale, and architectural features of the historic property.

Because the auditorium/theater addition would be constructed at the rear of the old Main Library building and would be smaller in size and scale compared to the historic building, the addition would not adversely affect the old Main Library, assuming the addition were designed to be compatible with the historic building in height, massing, fenestration, materials, color, texture, detail, style, scale and proportion, signage, landscaping and street furniture, as required by Article 10 of the Planning Code.

Extension of the McAllister Street frontage toward Hyde Street to resemble in plan the existing Fulton Street wing is a potential future phase of the project, now unfunded. The McAllister expansion would similarly be required to comply with Article 10 and would require a Certificate of Appropriateness.

CONCLUSION

As described in detail above, the project would result in a significant impact on historic architectural resources, in that it would demolish most of the interior of the old Main Library building, including a number of spaces identified as Exceptionally Significant Interior Spaces in the Planning Code (Appendix J of Article 10 (Sec. 10)). The project would include demolition of ground floor elevator lobbies; demolition of the panels in the outer walls of the second-floor loggia that contain the Piazzoni murals, and removal of the Piazzoni murals, retaining other wall elements including the columns, wall base and entablature (including inscriptions), and constructing new columns; construction of a new floor level within the second-story reading rooms; partial

demolition of the north wall of the Fulton Street reading room and construction of large openings at the second and new third floors; and demolition of north and south portions of the east wall of the Larkin Street reading room; as well as demolition of numerous other spaces identified in building survey reports as having historic architectural merit. Because the duMond murals were not originally installed in the museum and because they are not considered to have the same artistic merit as the Piazzonis, relocation of the duMond murals, if carried out without substantial damage, would not likely be considered a substantial adverse effect.

The project would alter the existing exterior facades of the old Main Library building, including installation of a hipped-roof mechanical penthouse and screen; construction of new doors, elimination of some existing windows; creation of an outdoor garden and outdoor dining area; removal of existing statuary and installation of new statuary; changes in windows and/or glazing; and removal of existing brick from the secondary east facade and from the north side of the south wing and the light courts. The EIR preparers believe that these exterior alterations would not substantially affect the local and national historic districts in which the old Main Library building is considered contributory. This is because the majority of changes to the building would be on its interior, exterior changes would be limited in scope, and, while a new roof element would be added, none of the changes would affect the relationship between the old Main Library building and City Hall, which is the key element unifying the buildings within the local and national historic districts as articulated in the 1974 nomination form for the National Register historic district. Nonetheless, opponents of the project, including recognized experts such as the State Historic Preservation Officer (SHPO) and the representatives of the National Park Service (NPS), have stated their belief that the interior and exterior alterations proposed would "very severely impact the integrity of the building" and that, as a result, "the building would no longer have the ability to contribute to the significance of the National Historic Landmark District" (Look, 1998).

Regarding the local Civic Center Historic District, the Planning Commission and Board of Supervisors could choose to retain the old Main Library building as Contributory to the local historic district, or could determine that Appendix J need be revised to designate the old Main Library building as Contributory/Altered, or as Noncontributory.

As stated in the setting, a Certificate of Appropriateness is required for major alterations to the building exterior and to the Exceptionally Significant Interior Spaces identified in the Planning Code. A Certificate of Appropriateness would require approval, in accordance with Planning Code Section 1006.7 and Article 10, Appendix J, Section 9, by the Planning Commission on the advice of the Landmarks Preservation Advisory Board.

The National Park Service and the State Office of Historic Preservation reviewed the proposed changes to the old Main Library building in September 1997 and concluded that the project would not meet the Secretary of the Interior's *Standards for Rehabilitation*. Concerns cited referred to many aspects of the project described above, including alteration of the circulation pattern through the building, relegating the Monumental Staircase to secondary status; installation of a new floor level within the second floor reading rooms and removal of

architectural detail therein; alteration of the stair loggia, including removal of the Piazzoni murals; changes to the light courts and Fulton Street facade; demolition of secondary spaces such as ground floor rooms and stairways; and removal of the statues above the Larkin Street entrance (Look, 1997). Removal of the interior walls of the Great Hall as part of the building's seismic upgrade was also cited by SHPO; this was formerly proposed but is no longer included in the project.

Subsequent review of the project by the National Park Service and the State Office of Historic Preservation, following publication of the DSEIR, resulted in comments that the project would affect the old Main Library building so that the structure would no longer contribute to the Civic Center National Historic Landmark District or the Civic Center Historic District that is listed in the National Register of Historic Places. The Park Service stated that it "would recommend the removal of the building from the list of contributing structures to the historic significance of the district as it would no longer convey the architectural designs of George Kelham" (Look, 1998).

REFERENCES - Historic Architectural Resources

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, as part of the project file.

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Wharton, Glenn, Wharton & Griswold Associates, Inc., "San Francisco Main Public Library Allegorical Sculptures: Conditions Assessment." Prepared for the San Francisco Art Commission and the Asian Art Museum. March 15, 1996.

B. URBAN DESIGN

SETTING

As stated in the Main Library/Asian Art Museum FEIR, the project site is in the San Francisco Civic Center, which includes a collection of monumental public buildings reflecting the Beaux Arts-inspired City Beautiful movement. The area also includes a number of newer office structures, including the nearly complete State Office Building and Phillip Burton Federal Building, both on Golden Gate Avenue one block north of the site, and the California State Automobile Association tower at Van Ness Avenue and Fell Street, five blocks southwest. Other newer buildings include the New Main Library, across Fulton Street from the project site; Hastings College of the Law, across McAllister Street; and the San Francisco Civic Center Courthouse, one block west.

Civic Center Plaza occupies a double block immediately west of the project site. It is bounded by McAllister, Larkin, Grove, and Polk Streets. The plaza includes two newly developed children's playground, a rectangular site that formerly housed a fountain, rows of flagpoles and pollarded sycamore trees lining the former fountain, and landscaping in the form of lawns and groups of trees. The brick-paved United Nations Plaza extends to the east from the southeast corner of the project site to Market Street. Because of the openness of the Civic Center, the project site is visible from a large part of the area west to City Hall, on the west side of the Plaza, and from U.N. Plaza to the east. The New Library block is also clearly visible from U.N. Plaza. From points farther west, City Hall obstructs the view; from points south, east, and north, existing development obscures views except down street corridors.

IMPACTS

SIGNIFICANCE CRITERIA

The existing visual character of the site is determined by the attributes (i.e. color, form, texture) of existing built features. Impacts to the visual quality or character of a site may occur as a result of demonstrable negative aesthetic effects, degraded or obstructed scenic views from public areas, and the production of new substantial light or glare.

IMPACT ASSESSMENT

As described above under Historic Architectural Resources, p. 57, the proposed Asian Art Museum project would preserve and retain most of the principal exterior facades of the old Main Library building. Exceptions would include construction of the proposed 16-foot-tall mechanical penthouse / screen above the Larkin Street facade and 7-foot-tall mechanical screen above Fulton and McAllister Streets, installation of new ground floor doorways on Fulton Street, removal of the statues above the Larkin Street entrance and placement of new statues of lions near the Larkin Street entrance, and covering of the inscription identifying the library and installation of new signage identifying the museum (completed in 1998). New doorways would be also be added in the Hyde and McAllister Street facades, and the two set back facades on

these streets would be altered by the construction of the proposed Central Court and glass-enclosed stairway (or escalators). These changes are illustrated on Figures 2 through 5, pp. 30 through 33, and described in detail in Section III.A, Historic Architectural Resources. Additional free-standing sign(s) identifying the Asian Art Museum would also likely be installed at ground level.

Addition of the mechanical penthouse likely would be the most noticeable change to the building's exterior, particularly in views of the principal Larkin and Fulton Street facades. The penthouse would be visible from Civic Center Plaza and the steps of City Hall to the west, and from the steps of the New Main Library to the south. The screen, shorter and set back farther, would be hidden by the existing building in most ground-level views. The penthouse would be in the form of a hipped (sloped) roof intended to respond to similarly shaped roofs on the existing California State Building at 350 McAllister Street (kitty-corner from the old Main Library), the Old Federal Building (across Hyde Street from the old Main Library), the new Civic Center Courthouse at Polk and McAllister Streets, one block to the west, and the Opera House and Veterans' Building, two blocks west on Van Ness Avenue. Urban design is highly subjective, and a form may be aesthetically pleasing to one viewer and unattractive to another. The form of the penthouse addition would generally be consistent with the scale and massing of some Civic Center buildings, and therefore the Asian Art Museum project would not have a substantial demonstrable negative physical environmental aesthetic effect; nor would it substantially obstruct scenic views now available to the public. The effect of the penthouse is discussed further under Historic Architectural Resources Impacts, beginning on p. 57 of this document, in relation to its impact on historic resources.

The potential Phase 2 auditorium/theater addition at 45 Hyde Street would incorporate design elements and materials intended to be compatible with the old Main Library building, and would be comparable in scale and massing to surrounding development; therefore they would not have a substantial demonstrable negative aesthetic effect. The auditorium/theater addition would be smaller than the old Main Library building in plan, occupying less than one-fourth of the footprint of the library building, and would therefore be somewhat subsidiary to the older building in views of the two together. As noted in the discussion of Historic Architectural Resources, the auditorium/theater addition would be required by Planning Code Article 10 to be determined compatible with the historic district through the Certificate of Appropriateness process.

If the Phase 3 extension of the McAllister Street wing toward Hyde Street were completed, it would essentially fill in the northeast corner of the project block with new construction at the same scale as the existing building. The potential McAllister facade extension would likewise be required to comply with Article 10.

C. SHADOW

SETTING

Public open space in the project vicinity, existing and zoned, as shown on the City Planning Code zoning maps includes Civic Center Plaza, across Larkin Street to the west of the project site; Fulton Street between Civic Center Plaza and Hyde Street, formerly proposed as a Fulton Street Mall and now used for parking and circulation, and also the location of the Pioneer Monument; United Nations Plaza, which extends from Hyde Street to Market Street generally in the Fulton Street right-of-way and includes Leavenworth Street between Fulton and McAllister Streets; and the War Memorial Court, between the Opera House and Veterans' Building in the War Memorial Complex on Van Ness Avenue. The building setback in front of the Phillip Burton Federal Building on Golden Gate Avenue between Polk and Larkin Streets (one block north of the project site), while not designated open space, has functioned as a plaza (it is currently used for construction staging). Other open areas include the eastern portion of Fox Plaza at Market and Hayes Streets and the plaza in front of Hastings College of the Law at 198 McAllister Street at Hyde Street, diagonally across the intersection from the existing Main Library and 45 Hyde Street. In the project vicinity, Civic Center Plaza is the only park protected by the Sunlight Ordinance (Section 295 of the City Planning Code).

IMPACTS

SIGNIFICANCE CRITERIA

Planning Code Section 295 generally prohibits new buildings that would cause significant new shadow between the hours of one hour after sunrise and one hour before sunset, at any time of the year on open space under the jurisdiction of the San Francisco Recreation and Park Commission. A project would have a significant effect if it would result in substantial new shadow on public open space under the jurisdiction of the Recreation and Park Commission. An absolute cumulative limit of new shadow, of 1 percent, was adopted for Civic Center Plaza. That amount has been used by recent new development, including the New Main Library.

IMPACT ASSESSMENT

The project would include construction of a 16-foot mechanical penthouse enclosure with a hipped (sloped) roof, set back about four feet from the Larkin Street facade, to screen the proposed new rooftop mechanical equipment. Although the penthouse would be exempt from the Planning Code height measurement of the building as an allowable rooftop mechanical appurtenance (Planning Code Section 260(b)(1)(A)), it would nevertheless raise the physical height of the existing building by about 16 feet¹¹ and would be an addition to a building that exceeds 40 feet in height. Therefore, the project is subject to Section 295 of the Planning Code and a shadow analysis was conducted to determine the general extent of new shadow on Civic Center Plaza, which is under the jurisdiction of the Recreation and Park Department.

¹¹ The effect on shadow of the height increase would be less than a 16-foot vertical extension at the facade because the penthouse would be set back from the facade and would have a sloped roof.

Section 295 prohibits the issuance of building permits for structures or additions to structures that would shade property under the jurisdiction of, or designated to be acquired by, the Recreation and Park Commission, during the period from one hour after sunrise to one hour before sunset, unless the City Planning and Recreation and Park Commissions determine that such shade would have an insignificant impact on the use of such property. In 1989, the two Commissions adopted shadow criteria for Downtown parks, including an Absolute Cumulative Limit for new shadow for each open space and set forth qualitative criteria for assessing new shadow. The Absolute Cumulative Limit for Civic Center Plaza was set at 1 percent additional shadow-foot-hours per year. Qualitative criteria call for preservation of afternoon sun, particularly on seating areas and lawn areas.

Since the Absolute Cumulative Limit and the criteria were adopted, the New Main Library at Larkin and Grove Streets and the Courthouse at Polk and McAllister Street have been constructed. These two projects together absorbed the allowable 1 percent new shadow on Civic Center Plaza. Therefore, the effective available new shadow limit is zero.

The mechanical penthouse on the proposed Asian Art Museum (old Main Library building) would add new shadow to Civic Center Plaza from March through September in the early morning hours before about 9:00 a.m., when the sun is low on the horizon. After these hours, the sun would be high enough in the sky such that the penthouse would cause no new shadow. From October through February, the sun is too far south to result in the old Main Library building, including the proposed new mechanical penthouse, casting new shadow on Civic Center Plaza.

The project would increase total year-round shadow on Civic Center Plaza by approximately 958,718 net new shadow-foot-hours during Section 295 hours. This would represent approximately 0.116 percent (about one-ninth of 1 percent) of the total year-round square-foot-hours of sunlight on Civic Center Plaza at the time the Section 295 criteria were established, which is the base for the Section 295 analysis. This would mean that the amount of shadow on Civic Center Plaza would have increased by 1.116 percent, compared to the Section 295 baseline, which is greater than the 1 percent absolute cumulative limit. (The 1.116 percent includes the 1 percent absorbed, as noted, by recent development, plus 0.116 percent due to the project.)

This additional shadow would not be expected to interfere with use of the Plaza, nor would it conflict with the qualitative criteria that, as noted, call for preservation of afternoon sun. However, new shadow from the Asian Art Museum project would exceed the Absolute Cumulative Limit for Civic Center Plaza.

With anticipated cumulative development – the City is proposing to construct a new office building at the site of an existing vacant state office building at 525 Golden Gate Avenue at Polk Street – shading would increase by about 0.001 percent compared to the Section 295 baseline, and the total increase over the Section 295 baseline would be 1.117 percent.

In order for the project to be approved, the City Planning and Recreation and Park Commissions would have to find the new shadow to be *de minimus* (that is, so minimal as to not be significant), or increase the Absolute Cumulative Limit for the space.

The auditorium/theater addition on a portion of the 45 Hyde Street site would, as stated in the Main Library/Asian Art Museum FEIR (pp. 101-115), cast new shadow on surrounding streets and sidewalks on the elevated plaza in front of Hastings College of the Law, at the northeast corner of McAllister and Hyde Streets. The addition would not add any new shadow to Civic Center Plaza or any other public open space, nor would the potential future extension of the McAllister Street facade. The shadow analysis in the Main Library/Asian Art Museum FEIR assumed buildout of the full 45 Hyde Street site, and therefore adequately analyzed the potential full expansion at this site, included as Phases 2 and 3 of the project.

D. TRANSPORTATION

SETTING

The Main Library/Asian Art Museum FEIR and May 1996 EIR Addendum assess the Transportation Setting and Impacts. They are incorporated by reference and summarized here. Since certification of the Main Library/Asian Art Museum FEIR and publication of the May 1996 EIR Addendum, there have been changes to the regional roadway system that have affected some roadways and intersections in the project vicinity. Damaged in the 1989 Loma Prieta earthquake, the Central Freeway (U.S. 101) between Oak/Fell Streets and Gough/Franklin Streets was demolished in 1992, and temporary bracing was added to support the roadway between Oak/Fell Streets and Mission Street. This latter portion of the freeway was closed to traffic in 1996, and the upper (southbound) deck between Oak and Mission Streets was demolished later that year. Closure of the freeway resulted in increased volumes on some surface streets, notably Ninth and Tenth Streets north of Bryant Street, where there are an off-ramp and an on-ramp, respectively. The lower (northbound) deck, to the Fell Street off-ramp, was reopened to traffic in April 1997, providing a route for northbound motorists and reducing volumes on Ninth Street. On November 4, 1997, San Francisco voters passed a measure calling for retrofitting and widening the remaining freeway to accommodate two-way traffic, and reconstruction of the Oak Street on-ramp. Assuming funding is available and this freeway project is implemented, freeway capacity would return to approximately its pre-1996 levels; i.e., the Oak Street on-ramp and the Fell Street off-ramp would each lead to/from two traffic lanes on the freeway.

The following discussion summarizes and incorporates by reference the 1996 EIR Addendum for the Asian Art Museum project, which reviewed transportation effects as analyzed in the Main Library/Asian Art Museum FEIR in light of the subsequent *Civic Center Complex EIR* (for rehabilitation of the State Office Building at 350 McAllister Street and demolition and new construction of a new State office tower at 455 Golden Gate Avenue; SCH No. 94011008, FEIR Certified May 4, 1995). This analysis also incorporates information from the Transportation Report for a proposed City Administrative Building (Case No. 97.478!, June 9, 1998) at 525 Golden Gate Avenue. Assumptions made in the Main Library/Asian Art Museum FEIR

concerning trip generation of the Asian Art Museum project remain valid. This analysis focuses on whether changes in traffic conditions in the Civic Center have changed so as to affect the analysis and conclusions in the Main Library/Asian Art Museum FEIR, as updated in the 1996 EIR Addendum; that is, whether the analysis remains current and valid.

IMPACTS

SIGNIFICANCE CRITERIA

City policy has been that a project is considered to have a significant effect on the environment if it would cause a signalized intersection to deteriorate to an unacceptable level (i.e., from LOS D or better to LOS E or F), interfere with existing transportation systems causing substantial alteration to circulation patterns or causing major traffic hazards, or contribute substantially to cumulative traffic increases that cause intersections that would otherwise operate at acceptable levels to deteriorate to unacceptable levels. The City has no formally adopted significance criteria for potential impacts related to transit, but City policy has been that a project would have a significant effect if it would cause a substantial increase in transit demand that cannot be accommodated by existing or proposed transit capacity, resulting in unacceptable levels of transit service. Regarding parking, San Francisco General Plan policies emphasize the importance of public transit use and discourage the provision of facilities that encourage automobile use. Therefore, the creation of parking demand that cannot be met by existing or proposed parking facilities would not itself be considered a significant effect. However, the City would consider whether the unmet parking demand would result in other significant physical effects. The City has no adopted significance criteria for pedestrian or bicycle impacts. For this analysis, the project would have a significant effect if it were to result in substantial pedestrian overcrowding, create particularly hazardous conditions for pedestrians or bicyclists, or otherwise substantially interfere with pedestrian and bicycle accessibility. Generally, construction-period transportation impacts would not be considered significant because they would be temporary and intermittent.

IMPACT ASSESSMENT

As stated on p. 131 of the Main Library/Asian Art Museum FEIR, the Asian Art Museum would generate a maximum of about 8,250 person trip ends daily (all modes of travel), including 7,500 patron trips and 750 employee trips.¹² This volume is based on peak attendance as projected by museum staff, reflecting major "blockbuster" exhibitions that could be held during approximately four months of each year. At other times, impacts would be less. Therefore, this is a conservative analysis. Further, no attempt was made to estimate the number of linked trips; that is, trips that would involve a combined visit to the New Main Library and the Asian Art Museum or a visit to one, or both, by workers or others already at Civic Center, also a conservative assumption.

¹² A "trip end," or simply "trip," is a one-way trip; a person who arrives at the museum and later departs, making one round-trip, will have accounted for two "person trip ends." If that person drives, she has generated two vehicle

The museum would generate a total of about 675 person trips in the p.m. peak hour, including about 145 p.m. peak-hour vehicle trips, about 175 MUNI and BART transit trips, about 265 pedestrian trips, and about 40 trips by other modes, including regional transit (SamTrans, Golden Gate Transit), bicycle and motorcycle; about 50 additional persons would be carpool passengers (Table 3, p. 133 of the Main Library/Asian Art Museum FEIR). Total p.m. peak-hour vehicle trips generated by the New Main Library and the Asian Art Museum were shown in the Main Library/Asian Art Museum FEIR to result in acceptable intersection operations (Level of Service (LOS) D or better) in the p.m. peak hour at all but one of the intersections studied in the local area (see Table 4, Main Library/Asian Art Museum FEIR p. 135). The intersection of Ninth and Market Streets was forecast to operate at LOS E (poor; intersection at capacity), under both existing and with-project conditions, although this would not represent a change in intersection level of service due to the project including the Asian Art Museum.¹³ By 2000, with the addition of trips generated by cumulative development in the project vicinity, all intersections would continue at acceptable levels of service, with the exception of Ninth/Market, which would operate at LOS F (jammed conditions), with or without the addition of the New Main Library and Asian Art Museum travel.

Five intersections analyzed in the Main Library/Asian Art Museum FEIR (1990 conditions) were also studied in the *Civic Center Complex EIR* in 1994. In general, the later analysis showed that traffic volumes had decreased in the Civic Center area, resulting in slight improvements in both existing and future intersection operations, including Ninth/Market, which was found to operate at an acceptable level of service (LOS D) in 2000 with the proposed state office building plus cumulative development, including the Asian Art Museum project. In analysis for the proposed City Administrative Building, three intersections also analyzed for *Civic Center Complex EIR* were found to operate under existing (1997) conditions at levels of service somewhat worse than in 1994 in two instances (Larkin and Golden Gate, LOS B vs. LOS A, and Van Ness and Golden Gate, LOS C vs. LOS B) and slightly better in one instance (Van Ness and McAllister, LOS B vs. LOS B/C).¹⁴ All three intersections, however, continue to operate at acceptable levels of service, and would continue to do so, with no change from existing conditions, by 2000 with the assumed addition of traffic from several projects in the Civic Center, including the Asian Art Museum project, which was part of the cumulative analysis in both the *Civic Center Complex EIR* and the Transportation Study for the proposed City Administrative Building. This is generally consistent with findings from the *Civic Center Complex EIR* and the Main Library/Asian Art Museum FEIR. Effects on transit, pedestrians, and parking, and construction-related transportation effects would be as reported in the Main Library/Asian Art Museum FEIR and the 1996 EIR Addendum. In summary, transit trips generated by the Asian Art Museum would contribute incrementally to cumulative increases in transit ridership but would not, by themselves, measurably affect transit service. The project sponsor would, if necessary, install

trips; if she takes MUNI or BART to the museum and departs by walking, she will have accounted for one transit trip and one pedestrian trip.

¹³ The Ninth/Market analysis was conservative in the *Main Library FEIR* in that it did not assume that through and right-turning vehicles may use the right lane of Ninth Street when no buses are stopped at the southeast corner.

¹⁴ The City Administrative Building analysis was performed using a different methodology - the Highway Capacity Software, which is now the most common approach - than the two earlier EIRs, which were analyzed using the so-called Circular 212 methodology.

eyebolts for MUNI trolley wires on the potential 45 Hyde Street building and/or McAllister Street extension. Pedestrian flows would not result in unacceptable congestion on sidewalks and crosswalks. Along with cumulative development in the Civic Center, the Asian Art Museum project would contribute to a potential cumulative parking shortfall, particularly on weekdays on which exhibitions at the Asian Art Museum and/or events at Civic Auditorium attract large numbers of visitors. (See pp. 149-151 of the *Main Library/Asian Art Museum FEIR*.) This could result in drivers having to park farther from their destinations, shift to other modes of travel such as transit, or make discretionary trips at off-peak times. The Main Library/Asian Art Museum FEIR was conservative in basing trip generation information on a blockbuster art exhibition day. The effects of implementation of the 400-seat auditorium/theater addition, and the potential future extension/expansion of the McAllister Street wing of the old Main Library building, would fall within this conservative assumption and analysis. Although the actual square footage of the total project (all three phases) has increased somewhat, impacts would be the same, because the trip generation from which the traffic analysis is derived is computed based on anticipated numbers of visitors for a peak event, not on the basis of square footage, as for a typical office or retail use.

Construction effects would be temporary and could cause intermittent disruptions to traffic and transit (Main Library/Asian Art Museum FEIR pp. 154-157). Most other major construction projects evaluated in the prior FEIR and now completed or under way in the Civic Center would be finished by the time the museum project were to start construction, thus reducing the potential for cumulative construction-related transportation effects. At times, construction equipment could be operating across Larkin Street from the Civic Center Tot Lot and a new playground, located in the northeast and southeast quadrants, respectively, of Civic Center Plaza. Construction truck movement would be limited to the hours between 9:00 a.m. and 3:30 p.m., or as authorized by the Department of Parking and Traffic (DPT), to minimize peak-hour traffic (including transit) conflicts. The project sponsor and construction contractor(s) will meet with DPT, the Fire Department, MUNI and the Planning Department to determine other feasible means to reduce traffic congestion and pedestrian circulation impacts during construction. If subsurface sidewalk vaults are included in the project, the project sponsor would design subsurface sidewalk vaults to allow for future street widening and to accommodate street trees, subject to Department of Public Works approval.

A loading dock would be constructed at the lower level, accessed on Hyde Street. The project would provide two van spaces and one space for large semi-trailer trucks. Bicycle parking (about 10 spaces) and motorcycle parking (about 12 spaces) would be provided in this same area, also with access from Hyde Street. No on-site parking would be provided.

In view of the above, the analysis included in the Main Library/Asian Art Museum FEIR, updated in the 1996 EIR Addendum, remains current and valid and no further analysis is required.

E. AIR QUALITY

SETTING

The Bay Area Air Quality Management District (BAAQMD) operates a regional monitoring network that measures the ambient concentrations of six criteria air pollutants: ozone, carbon monoxide (CO), respirable particulate matter (PM10), lead, nitrogen dioxide, and sulfur dioxide. Existing and probable future levels of air quality in San Francisco can be generally inferred from ambient air quality measurements conducted by the BAAQMD at its two San Francisco monitoring stations. The Potrero Hill station at 16th and Arkansas Streets measures all criteria pollutants, including regional pollution levels (ozone), as well as primary vehicular emission levels near busy roadways (CO). The station at 939 Ellis Street (between Van Ness and Franklin) at BAAQMD headquarters measures only carbon monoxide. During this seven-year period 1990 to 1996, there were no violations of the one-hour or eight-hour CO standards at the Arkansas Street and Ellis Street monitoring stations. The state PM10 standard was violated from 5 to 15 days out of 60 or 61 measurement days between 1990 and 1994, but in 1995 the standard was not violated (which was the first time ever). In 1996 the state PM10 standard was violated only 2 days out of the 61 measurement days during the year. Ozone, nitrogen dioxide, and particulate sulfate measurements were within allowable maximum concentrations (CARB, 1995).

Comparison of these data with those from other BAAQMD monitoring stations indicates that San Francisco's air quality is among the least degraded of all developed portions of the Bay Area. Three of San Francisco's four prevailing wind directions, west, northwest, and west-northwest, blow from the Pacific Ocean, reducing the potential for San Francisco to receive air pollutants from elsewhere in the region. Local exceedences of state PM10 standards in San Francisco have been largely due to emissions from within the City. The primary sources of PM10 in the city are construction and demolition activities, combustion of fuels for heating, and vehicle travel over paved roads (BAAQMD, 1993). Airborne dust levels measured in San Francisco show occasional violations of the state PM10 (inhalable- or respirable-sized particles) standards, and maximum PM10 levels have declined over the six-year period described above. In general, particulate levels are relatively low near the coast, increase with distance from the coast, and peak in dry, sheltered valleys. The Bay Area is currently designated a "non-attainment" area for ozone and carbon monoxide (urban areas) under federal air quality standards (carbon monoxide attainment criteria have been met, but the attainment designation has not yet been received), and a "non-attainment" area for ozone and PM10 under state standards.¹⁵

¹⁵ The designation "non-attainment" refers to the condition in which an airshed does not meet state or federal ambient air quality standards, as applicable.

IMPACTS

SIGNIFICANCE CRITERIA

A project would have a significant effect on the environment with respect to air quality if it would violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation, expose sensitive receptors to substantial pollutant concentrations, or permeate its vicinity with objectionable odors.

IMPACT ASSESSMENT

The Main Library/Asian Art Museum FEIR found that daily transportation-related emissions from the two project components (New Main Library and Asian Art Museum) would not exceed Bay Area Air Quality Management District (BAAQMD) thresholds for significance. In 1996, the BAAQMD revised its standards, lowering significance thresholds for certain criteria air pollutants. Recalculation of projected emissions using current emissions factors for the year 2000 (approximate completion of construction), which are lower (more stringent) than the factors used in the Main Library/Asian Art Museum FEIR, indicates that the Asian Art Museum project would not exceed the BAAQMD's lower thresholds (see Table 4). Accounting for total emissions from both the Asian Art Museum and the New Main Library, emissions would still be within the BAAQMD thresholds, except in the case of carbon monoxide (CO).

TABLE 4
PROJECTED DAILY TRANSPORTATION-RELATED POLLUTANT EMISSIONS

	Emissions (lbs./day) ^a Asian Art Museum only	Emissions (lbs./day) ^a Asian Art Museum plus New Main Library	BAAQMD Standard (lbs./day)
Carbon Monoxide (CO)	473 ^b	706 ^b	550 ^b
Hydrocarbons (HC)	38	56	80
Nitrogen Oxides (NO _x)	41	62	80
Sulfur Dioxide (SO _x)	1	2	n/a
Suspended Particulate (PM ₁₀)	33	50	80

^a Project emissions are based on BAAQMD methodology shown in its *Guidelines* document (revised April 1996), an average vehicle trip generation rate of 1,755 per day for Asian Art Museum and 863 per day for New Main Library, an average trip length of 10.4 miles, and an average vehicle speed of 20 miles per hour. Year 2000 emissions factors were used. PM₁₀ emissions include entrained road dust (0.69 gram/mile) in addition to tire wear and exhaust emissions.

^b Significance of CO emissions estimated on local intersection basis.

SOURCE: Environmental Science Associates, 1998.

Exceedance of the CO threshold typically warrants a localized analysis of intersection CO levels. Because the Main Library/Asian Art Museum FEIR, using higher emissions factors, found that intersection CO levels would be well within both state and federal standards, it is expected that the current lower emission factors would similarly yield results within the standards. The conclusion of the Main Library/Asian Art Museum FEIR therefore remains valid, and no further analysis of air quality impacts is required. New improvement measures to reduce vehicle travel are included in this SEIR on p. 89.

REFERENCES - Air Quality

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, as part of the project file.

BAAQMD (Bay Area Air Quality Management District), Air Quality Handbook, 1991 Bay Area Average Emissions by Source Category, Appendix IV, 1993.

CARB (California Air Resources Board), Air Quality Data Summaries, 1990-1996.

F. GROWTH INDUCEMENT

The project, adaptive reuse of the old Main Library building to accommodate the Asian Art Museum, would increase cultural activity in the Civic Center. In combination with other recent and ongoing development, including construction of the New Main Library and renovation of Bill Graham Civic Auditorium and the Opera House, as well as construction and renovation of numerous government office buildings, the project would be expected to increase activity in the area. In fact, the Asian Art Museum seeks to increase its connection to the City of San Francisco and the Bay Area by locating in the Civic Center. As reuse of an existing structure with subsidiary additions, the project would not increase the capacity of the area to serve future growth, and would therefore be growth-inducing only to the extent that increased activity in the Civic Center, in general, could stimulate future development opportunities. The precise nature of this effect, however, is not quantifiable.

The project would be built in a developed urban area, and no expansion of the municipal infrastructure not already under consideration would be required to accommodate the project.

CHAPTER IV

MITIGATION MEASURES PROPOSED TO MINIMIZE POTENTIAL SIGNIFICANT IMPACTS OF THE PROJECT

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been, or would be, adopted by the project sponsor or project architect and contractor(s) and thus are proposed; some are under consideration and some have been considered and rejected by the project sponsor. Implementation of some may be the responsibility of other agencies. Measures under consideration or rejected would be required by the City Planning Commission as conditions of project approval if found feasible. Each mitigation measure and its status is discussed below.

There are several items required by law that would serve to mitigate impacts; they are summarized here for informational purposes. These measures include: no use of mirrored glass on the building to reduce glare, as per City Planning Commission Resolution 9212; limitation of construction-related noise levels, pursuant to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code, 1972); and observance of State and federal OSHA safety requirements related to handling and disposal of hazardous materials.

Measures which are not required by legislation but which would also serve to mitigate environmental impacts appear below. Improvement measures, which could reduce impacts that may be of concern but would not be significant impacts created by the project, are also included.

As described in Chapter I, Introduction, this is a Supplemental EIR. Accordingly, this chapter indicates the disposition of mitigation measures that were identified in the 1992 Main Library/Asian Art Museum FEIR. Some of those measures remain applicable to the project as currently proposed and have been incorporated here, while others have been modified in this SEIR. Some measures no longer apply, principally because they were identified in reference to the New Main Library component of the three-part project analyzed in 1992, and the library has been completed; they are so noted. Where a measure is not noted as being from the 1992 FEIR, it is newly identified in this SEIR.

HISTORIC ARCHITECTURAL RESOURCES

The following measures would reduce but not eliminate significant adverse effects on Historic Architectural Resources.

MEASURES PROPOSED AS PART OF THE PROJECT

MEASURES IDENTIFIED IN THIS SEIR

- The project sponsor has retained the services of a preservation architect, through construction of the Asian Art Museum.
- The Asian Art Museum would ensure that a qualified preservation architect prepares a complete Historic Structure Report regarding the old Main Library building.
- The Asian Art Museum would ensure that, to the maximum extent feasible, existing building components that are proposed for removal and that are determined to be Significant or Very Significant by the Historic Structure Report(s) would be removed and replaced, in interior spaces to be retained as part of the project, under the direction of the preservation architect. To the extent that such materials are damaged, the museum would endeavor to replace them in kind. The museum would include such provisions in contractors' specifications.
- For those Significant or Very Significant features, as determined by the Historic Structure Report(s), to be retained in place, the Asian Art Museum would ensure that, to the maximum extent feasible, features are protected during construction. Should damage be noted during construction, work that could cause such damage would be halted and construction techniques would be re-evaluated to minimize damage. To the extent that such materials are damaged, the museum would endeavor to replace them in kind. The museum would include such provisions in contractors' specifications.
- The Asian Art Museum and its preservation architect would work with the San Francisco Art Commission, the Museum of the City of San Francisco, preservation organizations, and others, as applicable, to determine whether any materials removed from the old Main Library building could be salvaged for purposes of documentation, display, or other use.
- The Asian Art Museum would work with the San Francisco Art Commission and appropriate city department(s) to find a relocation site for the two duMond murals. The duMond murals could be placed in temporary storage pending a determination regarding a relocation site.
- The Asian Art Museum would work with the San Francisco Art Commission to find relocation sites for the Lentelli sculptures above the Larkin Street entrance and the bust of Edward Robeson Taylor in the entrance lobby (Room 191).
- The Asian Art Museum would install on the old Main Library a plaque and/or other monument memorializing the building's service as the San Francisco Public Library. The museum would also include a pictorial display of the building's history in a publicly accessible location inside the museum. Design and placement of such plaque(s) and display(s) would be reviewed and approved by the Planning Department in consultation with the Landmarks Preservation Advisory Board.

REVISED MEASURE FROM THE 1992 FEIR

- The Asian Art Museum would work with the San Francisco Art Commission and appropriate city department(s) to find a relocation site for the 14 Piazzoni murals. Consistent with Board of Supervisors' Resolution No. 1144-97, the Asian Art Museum would remove the Piazzoni murals from the old Main Library prior to the start of major construction, to protect the murals during that time, and would explore options for the relocation and public display of the Piazzoni murals. The Asian Art Museum Foundation has allocated \$250,000 towards restoration of the Piazzoni murals once they are removed.

MEASURE UNDER CONSIDERATION BY THE PROJECT SPONSOR

- Prior to the start of any demolition work, the Asian Art Museum could employ a qualified architectural historian to document the important historic architectural features of the old Main Library, including, at a minimum, those features designated in Planning Code Article 10 as Exceptionally Significant Interior Spaces and those features identified in Table 3, p. 63, as Preservation Zone 1 or 2 by the preservation architect. The format and content of the documentation would be approved by the Environmental Review Officer and the President of the Landmarks Preservation Advisory Board prior to the start of any demolition work. The museum would submit that documentation to the History Room of the San Francisco Main Library, the Secretary of the Landmarks Preservation Advisory Board, the Northwest Information Center of the California Historical Resources Information System at Sonoma State University, and the California Historical Society.

MEASURES FROM THE 1992 FEIR THAT ARE NO LONGER FEASIBLE OR ADDRESS IMPACTS THAT WOULD BE ELIMINATED BY NEW ALTERNATIVES

- The Board of Supervisors, in approving transfer of jurisdiction over the existing Main Library building to the Asian Art Museum, could establish as a condition that the museum adopt a remodeling program for the building that would comply with the Secretary of the Interior's *Standards for Rehabilitation*. The determination of compliance with the *Standards* could be made by the National Park Service, in consultation with the California Office of Historic Preservation.
- The Asian Art Museum could retain all 14, or the 10 original Piazzoni murals on the second floor balcony of the building.
- The Asian Art Museum, upon assuming jurisdiction over the existing Main Library building, could adopt a remodeling program for the building that would not remove the cement statues above the Larkin Street entrance. (Revised from the 1992 FEIR)¹⁶
- The Asian Art Museum staff could cover in place the Piazzoni murals, rather than remove them. (Revised from the 1992 FEIR)¹⁷

¹⁶ The remainder of the 1992 measure concerned removal of the inscription identifying and dedicating the existing Main Library building and of the inscribed names of literary figures on the end bays of the building, and lengthening of the windows on the Fulton Street side of the building; none of these actions is now proposed.

¹⁷ The remainder of the 1992 measure concerned covering the inscriptions on the existing Main Library, rather than removing them; the inscription identifying and dedicating the old Main Library building was covered in 1998, and neither removal nor covering of the inscribed names of literary figures is now proposed.

ARCHAEOLOGICAL RESOURCES

MEASURE PROPOSED AS PART OF THE PROJECT

MEASURE FROM THE 1992 FEIR

- The sponsor would retain the services of an archaeologist. The Environmental Review Office (ERO) in consultation with the President of the Landmarks Preservation Advisory Board (LPAB) and the archaeologist would determine whether the archaeologist should instruct all excavation and foundation crews on the project site of the potential for discovery of cultural and historic artifacts, and the procedures to be followed if such artifacts are uncovered.

Given the archival history of the project site, an historical archaeologist would be present during site excavation and would record observations in a permanent log. The ERO would also require cooperation of the project sponsor in assisting such further investigations on site as may be appropriate prior to or during project excavation, even if this results in a delay in excavation activities.

Should archaeological resources be found following commencement of excavation activities, the archaeologist would assess the significance of the find, and immediately report to the ERO and the President of the LPAB. Excavation or construction activities which might damage the discovered cultural resources would be suspended for a maximum of four weeks (cumulatively for all instances where the ERO has required a delay in excavation or construction) to permit inspection, recommendation and retrieval, if appropriate. Upon receiving the advice of the consultants and the LPAB, the ERO would recommend specific action to protect the resources, if necessary.

Following site clearance, an appropriate security program would be implemented to prevent looting. Any discovered cultural artifacts assessed as significant by the archaeologist upon concurrence by the ERO and the President of the LPAB would be placed in an appropriate repository as determined by the ERO. Copies of the reports prepared according to these mitigation measures would be sent to the Northwest Information Center of the California Historical Resources Information System at Sonoma State University along with three copies to the ERO.

TRANSPORTATION

MEASURES PROPOSED AS PART OF THE PROJECT

MEASURE IDENTIFIED IN THIS SEIR

- To minimize the potential for pedestrian-truck conflicts during construction, the project sponsor would post signs at the construction site and advise construction truck drivers of the presence of the Civic Center Tot Lot and playground, across Larkin Street from the project site.

MEASURES FROM THE 1992 FEIR

- The placement of paving, landscaping or structures in the sidewalk area (subject to City approval) would be done in such a way as to minimize interference with pedestrian traffic.
- The Asian Art Museum would provide traffic control personnel on Hyde Street during truck movements to ensure the safety of pedestrians and to minimize transit and automobile traffic disruption. The Museum would install a lighted sign and/or a noise-emitting device at the entrance to its loading dock to alert pedestrians to vehicles exiting the loading area.

MEASURE FROM THE 1996 FEIR ADDENDUM

- In order to provide for pedestrian safety during the construction period for the Asian Art Museum, the museum's construction manager would ensure that pedestrian walkways are maintained, as determined to be necessary by the Traffic Engineering Division of the Department of Parking and Traffic, during remodeling of the existing library building and construction of the addition to that building. Coordination between the Project Sponsor, construction contractor and City departments would also include the development of measures to ensure adequate pedestrian safety during the construction period. Typically, these measures include the placement of flag persons, warning signs, and barriers to control and protect pedestrian and auto traffic from construction vehicles, activity and equipment.

IMPROVEMENT MEASURES IDENTIFIED IN THIS SEIR

The following measures could reduce transportation issues that may be of concern, but would not be significant impacts created by the project.

- The Asian Art Museum would include secure bicycle parking facilities for employees and would provide employee showers to encourage bicycle commuting. This measure would also reduce emissions of criteria air pollutants, benefiting air quality. (Revised Mitigation Measure from 1992 FEIR)
- During the construction period, construction truck movement would be permitted only between 9 a.m. and 3:30 p.m., or at other times if authorized by the Department of Parking and Traffic, to minimize peak-hour traffic (including transit) conflicts. The Project Sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI and the Planning Department to determine feasible traffic mitigation measures to reduce traffic congestion and pedestrian circulation impacts during construction of this project and other nearby projects that are planned for construction or which later become known. To minimize cumulative traffic impacts due to lane closures during construction, the Project Sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction or become known. (1996 FEIR Addendum Mitigation Measure)

MEASURES THAT COULD BE IMPLEMENTED BY OTHER AGENCIES

MEASURES FROM THE 1992 FEIR

- Work schedules of Pacific Gas and Electric Company and other utilities requiring trenching would be coordinated, so that street disruption would take place during weekends and off-peak hours. This should be done through the San Francisco Committee for Utility Liaison on Construction and Other Projects (CULCOP). In-street utilities should be installed at the same time as the street is opened for construction of the project to minimize street disruption.
- The New Main Library and the proposed Asian Art Museum addition could be designed to include a direct underground connection to the Civic Center BART / MUNI Metro Station, making transit use more attractive to patrons and employees. This would require public funding and implementation by various local and other agencies.

MEASURE UNDER CONSIDERATION BY THE PROJECT SPONSOR

IMPROVEMENT MEASURE IDENTIFIED IN THIS SEIR

The following measure could reduce transportation issues that may be of concern, but would not be significant impacts created by the project.

- The Asian Art Museum could include secure bicycle parking facilities for visitors to encourage bicycle travel. This measure would also reduce emissions of criteria air pollutants, benefiting air quality. (Revised 1992 FEIR Mitigation Measure)

OTHER TRANSPORTATION MEASURES

The following mitigation measures from the 1992 FEIR, which would not necessarily address specific significant impacts created by the project are not included, but are contained within the text of this SEIR: consultation by the project sponsor and construction contractor(s) with the Department of Parking and Traffic, the Fire Department, MUNI and the Planning Department to determine feasible means to reduce traffic congestion and pedestrian circulation impacts during construction; placement of eyebolts for Municipal railway trolley wires; design of subsurface sidewalk vaults, if applicable, to allow for future street widening and to accommodate street trees, subject to Department of Public Works approval.

AIR QUALITY

MEASURES PROPOSED AS PART OF THE PROJECT

REVISED MEASURE FROM THE 1992 FEIR

- The project sponsor would require the contractor(s) to sprinkle exterior demolition sites with water during demolition, excavation and construction activity; sprinkle unpaved exterior construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and

sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.

MEASURE FROM THE 1992 FEIR

- The project sponsor would require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of PM₁₀ and other pollutants, by such means as a prohibition on idling of motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

IMPROVEMENT MEASURE IDENTIFIED IN THIS SEIR

The following measure could reduce air quality impacts that may be of concern, but would not be significant impacts created by the project.

- The museum would design and implement a trip reduction program to target visitor travel. For example, the museum could offer discount admission upon presentation of a valid transit pass or other proof of transit use payment. The museum could also provide MUNI, BART, Golden Gate Transit, SamTrans, Caltrain, and AC Transit information at its information desk. The museum currently has a program in place at its existing location in Golden Gate Park that incorporates some of the above measures.

MEASURE UNDER CONSIDERATION BY THE PROJECT SPONSOR

IMPROVEMENT MEASURE IDENTIFIED IN THIS SEIR

The following measure could reduce air quality impacts that may be of concern, but would not be significant impacts created by the project.

- To help induce shifts from vehicles to transit, the Asian Art Museum could institute a Transportation Demand Management Programs for employees. Such programs typically target primarily commute trips, with various educational, assistance and incentives measures to encourage carpooling and vanpooling, and transit use. These measures may be accompanied by such “disincentives” to low-occupant private vehicle use as restricting the amounts and/or location of parking made available to employees, and charging fees for all-day parking. The effectiveness of these programs is variable, but they are most appropriate and effective when there are substantial constraints to vehicular travel, circulation and storage coupled with suitable options such as excellent transit accessibility. San Francisco in general, and its Civic Center in particular, exhibit this combination of factors. The museum could, at a minimum, provide transit information to all staff members and could also subsidize, through provision of Commute Checks or cash rebates, MUNI and other transit passes for employees who regularly use transit to commute.

NOISE

MEASURES PROPOSED AS PART OF THE PROJECT

MEASURES FROM THE 1992 FEIR

- If pile driving were included in the project, the project sponsor would consult with the Department of Public Works to determine the time when pile driving would cause the least disturbance to neighboring uses. The project sponsor would require that the construction contractor(s) limit pile driving activity to result in least disturbance to people. This could require a work permit from the Director of Public Works pursuant to San Francisco Noise Ordinance Section 2908, if pile driving during nighttime hours were determined to be less disruptive to neighboring uses.
- If pile driving were included in the project, the project sponsor would require that the project contractor(s) predrill holes (if feasible based on soils) for piles to the maximum feasible depth to minimize noise and vibration from pile driving.
- The project contractor(s) would be required by the project sponsor to use construction equipment with state-of-the-art noise shielding and muffling devices.
- As recommended by the Environmental Protection Element of the San Francisco General Plan, an analysis of noise reduction measures would be prepared by the project sponsor and recommended noise insulation features would be included as part of the proposed buildings. For example, such design features could include fixed windows and climate control.

MEASURE UNDER CONSIDERATION BY THE PROJECT SPONSOR

MEASURE FROM THE 1992 FEIR

- The project sponsor could require the general contractor(s) to construct barriers around the 45 Hyde Street site and around stationary equipment such as compressors, which would reduce construction noise by as much as five dBA, and to locate stationary equipment in pit areas or excavated areas, as these areas shall serve as noise barriers.

GEOLOGY/TOPOGRAPHY/HYDROLOGY

MEASURES PROPOSED AS PART OF THE PROJECT

MEASURES FROM THE 1992 FEIR

- One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor(s) would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project.

- The project sponsor would require the general contractor(s) to install and maintain sediment traps in local stormwater intakes during the construction period to reduce the amount of sediment entering the storm drain / sewer lines, if this is found necessary by the Industrial Waste Division of the Department of Public Works.
- The project sponsor and contractor(s) would follow the geotechnical engineers' recommendations regarding installation of settlement markers around the perimeter of shoring to monitor any ground movements outside of the shoring itself. Shoring systems would be modified as necessary in the event that substantial movements were detected.
- Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater observation wells would be installed to monitor the level of the water table and other instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable subsidence were to occur during construction, groundwater recharge could be used to halt this settlement. The project sponsor would delay construction if necessary. Cost for the survey and any necessary repairs to service under the street would be borne by the project sponsor.
- Preliminary investigation for the seismic upgrade of the [old Main] Library building for the Asian Art Museum indicates that dewatering may not be necessary. A geotechnical report would be prepared and its recommendations followed.

MEASURE FROM THE 1996 FEIR ADDENDUM

- If dewatering were necessary, groundwater pumped from the site shall be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to reduce the amount of sediment entering the storm drain/sewer lines. Any groundwater encountered during construction shall be subject to the requirements of the City's Industrial Waste Ordinance (Ordinance No. 199-77), requiring that groundwater meet specified standards before it may be discharged into the sewer system. The Bureau of Environmental Regulation and Management of the Department of Public Works must be notified of projects necessitating dewatering. That office may require analysis before discharge.

HAZARDS

MEASURES PROPOSED AS PART OF THE PROJECT

MEASURES FROM THE 1992 FEIR

- In order to reduce potential injury to building occupants during an earthquake or other catastrophic emergency, evacuation and emergency response plans would be developed by

the project sponsor or building management staff, in consultation with the Mayor's Office or Emergency Services to ensure coordination between the City's emergency planning activities and the project's plans and to provide for building occupants in the event of an emergency. The project plans would be reviewed by the Office of Emergency Services and implemented by building management insofar as feasible before issuance by the Department of Public Works of final building permits.

- To expedite implementation of the City's emergency response plan, the project sponsor would prominently post information for building occupants concerning what to do in the event of a disaster.

REVISED MEASURE FROM THE 1996 FEIR ADDENDUM

- The project sponsor would ensure that building surveys have been, or are, conducted to identify asbestos-containing materials, PCB-containing electrical equipment, lead-based paint, fluorescent light tubes that may contain mercury, and any other potentially hazardous building materials. If necessary to protect public health, construction workers, or the environment, removal, abatement, and disposal of identified hazardous building materials or other hazardous substances would be conducted prior to demolition of existing structures, as required by the Bay Area Air Quality Management District, the California Occupational Safety and Health Administration, and federal, state, and local laws, including Titles 22 and 23 of the California Code of Regulations (Hazardous Materials and Water Quality), Chapter 36 of the San Francisco Building Code (Work Practices for Exterior Lead-Based Paint), and the City's Hazardous Materials Ordinance.

MEASURES FROM THE 1992 FEIR NOT APPLICABLE TO THE ASIAN ART MUSEUM PROJECT AND THEREFORE NOT PROPOSED

TRANSPORTATION

- Secure bicycle storage facilities which would, at a minimum, provide safe shelter would be provided for commuters and short-term visitors to the New Main Library. The New Main Library would include showers for employees to encourage bicycling and walking as commute alternatives for employees in the project.
- The ramp leading to the library and Brooks Hall loading areas would include warning devices (lighted signs and noise-emitting devices) to alert pedestrians to vehicles exiting the structure.
- Lighted and audible indicators would be installed inside the library loading area to alert other drivers and employees to the presence of vehicles using the loading ramp.
- Staff of the New Main Library and Brooks Hall would coordinate truck loading and unloading activity to minimize conflict between delivery vehicles serving the two uses. Specifically, the library would schedule deliveries that would be made by semi-trailer to occur on days when there would be no scheduled truck activity at Brooks Hall. Brooks Hall staff would provide library staff with a schedule of loading and unloading activity as

often as is required to keep library staff apprised of scheduled activity at the Brooks Hall loading area.

- In order to provide for pedestrian safety during the construction period for the New Main Library, the library's construction manager would ensure that pedestrian walkways were maintained at the ends of Fulton Street at Larkin and Hyde Streets during the construction period. Four-foot pedestrian walkways would be provided on Larkin and Grove Streets where construction would preempt sidewalk space.
- The Department of Parking and Traffic could consider permitting the use of on-street parking spaces on the east side of Hyde Street between McAllister and Fulton Street as a "holding area" for Brooks Hall trucks on days of loading/unloading activity at Brooks Hall.
- Brooks Hall staff could arrange for incoming trucks, making deliveries or pickups, to go first to a staging area. Trucks would be dispatched from the staging area to Brooks Hall when adequate capacity were available within the Brooks Hall loading area to minimize interference with library loading activity or traffic on Hyde Street.
- Brooks Hall staff could provide traffic control in the form of personnel stationed at the Hyde Street end (mouth) of the loading ramp during truck movements to ensure the safety of pedestrians and to minimize transit and automobile traffic disruption due to trucks on days of loading/unloading activity at Brooks Hall.
- Brooks Hall and Civic Auditorium staff could encourage organizations scheduling events at those facilities to include information on public transit accessibility in their promotional and advertising information.

GEOLOGY/TOPOGRAPHY/HYDROLOGY

- The project sponsor and contractor(s) would follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities and buildings that could potentially occur as a result of dewatering. The present proposed scheme for the New Main Library is to install soldier piles and lagging around the New Main Library site and then install dewatering wells or sumps inside the wall to dewater only the inside area. Monitoring wells would be installed around the outside of the excavation to monitor the water level throughout the construction period. Recharge of groundwater could be performed if a substantial drop in water levels took place outside of the excavation.

CHAPTER V

SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21100(b)(2)(A) of the California Environmental Quality Act (CEQA), and with Section 15126(b) of the State CEQA Guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, or by other mitigation measures that could be implemented, as described in Chapter IV, Mitigation Measures, pp. 84-94.

This chapter is subject to final determination by the City Planning Commission as part of its certification process for the EIR. The Final EIR will be revised, if necessary, to reflect the findings of the Commission.

The project would retain some of the Exceptionally Significant Interior Spaces identified in the Planning Code, including the Larkin Street entrance lobby, vestibule and corridor; the Monumental Staircase; the Great Hall, second-floor west corridor, and part of the second-floor loggia. Many interior finishes would be retained as part of the renovation.

The Asian Art Museum would retain and adaptively reuse the old Main Library building. However, the plan would result in demolition or alteration of much of the interior of the old Main Library building, including a number of spaces designated as Exceptionally Significant Interior Spaces in the Planning Code (Appendix J of Article 10 (Sec. 10)). Therefore the project would result in a significant unavoidable effect on Historic Architectural Resources.

As discussed in Chapter III and set forth in Table 3, p. 63, the project would remove the Piazzoni murals and demolish the wall panels in the second floor loggia on which the murals are mounted, demolish the east wall of the second-floor loggia, demolish the ground-floor elevator lobbies, and construct a new floor level within the second-story reading rooms. The project would also demolish or substantially alter a number of other Exceptionally Significant Interior Spaces and other spaces identified in building survey reports as having historic architectural merit.

The building's two principal character-defining elevations, on Larkin and Fulton Street, would be retained, with the exception of construction of the new mechanical penthouse and screen, removal of the statues above the Larkin Street entrance, installation of previously approved signage (completed in 1998), and creation of new doorways on Fulton Street. Exterior walls of the two existing light courts would be largely demolished to construct the proposed Central Court.

The project as proposed could potentially generate significant adverse shadow impacts on Civic Center Plaza; this park is under the jurisdiction of the Recreation and Park Department and is subject to the requirements of the sunlight ordinance (Section 295 of the Planning Code). This additional shadow would not be expected to interfere with use of the Plaza, nor would it conflict with qualitative criteria adopted by the Planning Commission and Recreation and Park Commission that call for preservation of afternoon sun. However, new shadow from the Asian Art Museum project would exceed the Absolute Cumulative Limit for Civic Center Plaza, and would require either that the two commissions find the new shadow to be *de minimus* (that is, so minimal as to not be significant), or that the commissions increase the Absolute Cumulative Limit for this plaza.

Cumulative development in the Greater Downtown and Vicinity in San Francisco (which includes the project site) would have a significant effect on the environment in that it would contribute to cumulative traffic increases as well as cumulative passenger loadings on MUNI, BART and other regional transit carriers. These cumulative transportation impacts could cause violations of air quality standards. The proposed project would contribute incrementally to these cumulative effects.

The Main Library/Asian Art Museum FEIR found a significant impact regarding geology due to exposure of additional persons on the project site, above existing conditions, to substantial danger during a major earthquake. While the site is within the seismically active Bay Area, the project would include seismic upgrading of the old Main Library building, which would therefore be safer than under existing conditions. While the potential hazards of earthquake-induced structural failure cannot be eliminated for any project, implementation of the proposed project, including compliance with applicable building codes, would reduce the impact of seismically induced structural damage and resulting personal injury to a less-than-significant level.

CHAPTER VI

ALTERNATIVES TO THE PROPOSED PROJECT

Alternatives for use of the old Main Library building analyzed in the Main Library/Asian Art Museum FEIR included expansion and reuse of the building as the Main Library, and reuse of the old Main Library building as a Courts Building. Neither of these alternatives is currently feasible. The New Main Library is now complete and occupied, across Fulton Street from the old Main Library building, rendering the first alternative infeasible. A new San Francisco Courthouse is complete and occupied at the corner of Polk and McAllister Streets, two blocks west of the Asian Art Museum project site, housing the Civil Division of the San Francisco Municipal and Superior Courts, formerly located at City Hall, as well as the Dependency Section of the Juvenile Courts, formerly located at the Youth Guidance Center. The courts alternative in the Main Library/Asian Art Museum FEIR would have relocated the Superior Court-Civil Division to the old Main Library building. Because the new Courthouse has been completed, this alternative is also superseded.

Since certification of the Main Library/Asian Art Museum FEIR, San Francisco voters in 1994 approved the issuance of \$41.7 million in general obligation bonds for upgrade of the old Main Library building for use as the Asian Art Museum. Because no other substantive proposals are known to have been put forward for reuse of the old Main Library building, and because the voters passed a bond issue specifically for use of the building by the Asian Art Museum, this SEIR does not identify additional alternative uses for the building, nor does it identify alternative sites for the Asian Art Museum. Three alternatives are considered: No Project, a Full Preservation Alternative, and a Reduced Impact on Historic Architectural Resources Alternative.

As explained below, the Full Preservation Alternative would eliminate the significant impact on historical resources, and would be the environmentally superior alternative. The Reduced Impact Alternative would reduce but not eliminate that impact. The Full Preservation Alternative has been developed by a preservation architect using a conservative approach that maximizes the retention of historic building fabric and associated qualities of the historic resource. The Reduced Impact Alternative represents more of a compromise approach, and was developed based on input from preservation groups and members of the public. These alternatives, together with the No Project Alternative and the project itself, represent a range of reasonable alternatives that brackets potential impacts associated with modifications to the historic resource. The impacts of minor variations on these alternatives would likely fall within the range of impacts described here. Project decision-makers must select an environmentally superior alternative unless that alternative is found to be infeasible on the basis of substantial evidence in the record.

A. ALTERNATIVE A: NO PROJECT

This alternative would entail no change to the site. The Asian Art Museum would not relocate from Golden Gate Park. Under this alternative, seismic strengthening of the old Main Library building would not occur as planned, because the bond funding was earmarked to convert the old Main Library building for use as the Asian Art Museum. This alternative could entail future reuse of the building by another City department (or, less likely, by a private entity, which could require sale of the building by the city and rezoning). As noted above, San Francisco voters approved the issuance of \$41.7 million in general obligation bonds for the Asian Art Museum project. A September 1992 Seismic Upgrading Study of the old Main Library building estimated the cost to make the building seismically safe for service as a public building at \$24 million (1996 dollars), with an additional \$16 million required for buildout for use by another tenant other than the library (Rutherford & Chekene, 1992).

Under this alternative, the Asian Art Museum might choose to relocate to another site in San Francisco, as this alternative would not address operational constraints at the existing Golden Gate Park site, such as lack of classrooms and meeting space and inadequate art storage and conservation facilities.

Under this alternative, effects relative to the Asian Art Museum project described herein and in the Main Library/Asian Art Museum FEIR and the 1996 EIR Addendum would not occur. The environmental characteristics of this alternative would be generally as described in the setting portions of this report and of the Main Library/Asian Art Museum FEIR. This alternative would preserve the option to develop the project site with a larger or smaller development proposal; the old Main Library building could remain vacant and unused for an indefinite period of time. However, if the building remained vacant for an extended period of time, this alternative could indirectly result in deterioration of the building due to neglect, potentially including damage to the exterior and to Exceptionally Significant Interior Spaces, as identified in the Planning Code. Under this alternative, an important San Francisco cultural resource would not locate at the Civic Center.

B. ALTERNATIVE B: FULL PRESERVATION ALTERNATIVE

DESCRIPTION

A historic preservation alternative would integrate the museum's program with the old Main Library building such that most significant historic architectural features of the existing building could be maintained. However, unlike in the proposed project, in which the Museum program dominates, this Full Preservation Alternative would consider the important historic architectural features of the existing building on an equal footing with the program requirements.

For example, the existing circulation pattern, or parti, characteristic of the building's original Beaux Arts design is an important feature of the old Main Library as designed by its architect, George Kelham. This pattern assumes entry at the ground floor level on Larkin Street, passage up the Monumental Staircase, through the loggia, and reception in the former Delivery Room, now known as the Great Hall, or library General Reference Room (Room 200). From that point, visitors proceed to other parts of the building in a somewhat diffuse way. Existing elevators and

ornamental stairs are located within the building so that unrestricted access to all levels is provided, also in a manner that allows for dispersion of visitors among different areas. As stated in Project Sponsor's Objectives, p. 21, under the project as proposed, the Asian Art Museum desires to move persons through its galleries in a more directed way, using the development of Buddhism as a theme. It would be necessary, in making a decision to maintain existing circulation patterns in the building (which are a significant historic architectural feature), to be flexible about allowing museum-goers to see galleries out of sequence.

The design of the project as proposed would reduce all the monumental second floor spaces on the south and west sides of the building to half their original height with installation a new floor plate, to provide new programmatic space. The Full Preservation Alternative would not offer this floor area because it would preserve the existing spaces. Instead, the Full Preservation Alternative would fill in the north light court at the lower level and first, second, third and fourth floors. (The proposed project design fills in only the lower level and main floor.) The Full Preservation Alternative would also fill in the south light court at the lower level and main and second floors, which is one level more than the proposed project.

The Full Preservation Alternative would provide for the following:

- As with the proposed project, a base isolation system and concrete shear walls would be installed to provide seismic strength; as with the project, shear walls would be installed at the four corners of the building and probably in the Great Hall as well, also like the project. In the three corner reading rooms, all interior finish materials would be removed, as with the project, to allow installation of the shear walls. Finish materials would be replaced (in the case of wood trim) or replaced in kind (as in the case of plaster walls); the bookshelves would not be replaced.

Also as with the project, shear walls would be constructed around the exterior of the Great Hall (Room 200) to avoid disturbing the interior of this Exceptionally Significant Interior Space. A new circulation armature (see below) that would be constructed within the "notch" in the project block at the 45 Hyde Street site would provide additional shear (lateral) support. In the second floor stair loggia, seismic strengthening would be accomplished without removal of the existing Piazzoni murals and travertine and faux travertine panels that compose the walls.

- Exterior changes under the Full Preservation Alternative would be extremely limited. This alternative would avoid putting all the new boilers, chillers, cooling towers, air handlers and ductwork on the roof of the existing building within a new hipped roof penthouse, as would occur with the proposed project. Under the Full Preservation Alternative, these large elements of the heating, ventilation, air conditioning (HVAC) system would be located elsewhere to reduce the impact on the exterior massing of the building; screening for mechanical equipment would be similar to that under existing conditions. Steam from the existing underground Civic Center steam loop could be used for heating (as it is in the new City Hall HVAC system), rather than the building relying on newly proposed boilers. Chillers and cooling towers would be located on the unbuilt portion of the site (or possibly

in the now-unused city steam plant across McAllister Street), and some of the ducts would be placed in the existing light courts (a location not available for HVAC elements in the project as currently proposed because of the creation of the proposed Central Court).

- The five Lentelli sculptures on the west (Larkin Street) elevation of the building would be maintained in place, repaired and conserved.
- New window glazing would be designed to minimize changes in external appearance (likely by avoiding the use of translucent white glass) while meeting the museum's needs for stricter climate control and sunlight blockage than is provided by the existing windows, for example by installation of new double-paned windows.
- As for the building's interior, the existing circulation pattern, or parti, would be retained. The main Monumental Staircase (S101) and the second floor stair loggia (Room 290), including the Piazzoni murals on three walls, would remain intact, as would Corridor 291A; all of these features are designated Exceptionally Significant Interior Spaces in Article 10 of the Planning Code. The existing skylights of the loggia would also remain, as with the project.

Two existing ornamental stairs (S102, immediately south of the Monumental Staircase, and S104, between the Great Hall and large Fulton Street reading room) in the south wing would also be retained, as would the existing locations of the primary elevators (E1 and E2, to either side of the Monumental Staircase); one or both of the elevator cabs might have to be replaced. The elevator lobbies (Rooms 192 and 193), also Exceptionally Significant Interior Spaces, would be retained as well. These elements would be demolished with the project. Also retained would be the Main Entrance Hall (Room 101), Vestibule (Room 191), and primary north-south corridor (Room 190), as they would under the proposed project.

In addition to the above spaces, all other Exceptionally Significant Interior Spaces on the second floor, including the Great Hall (Room 200) and the two large reading rooms (Rooms 201 and 210), would be retained in their present configuration. No new elevator would be installed partially within Room 200, as would be the case with the proposed project. The reading rooms would not be fitted with a new floor level, as in the proposed project. As noted in the description of the seismic upgrade, interior finish materials would be removed from the three corner reading rooms (Rooms 202, 203, 218) and would then be replaced following completion of the structural work; no new floor level would be installed. Corridor 291, at the west end of the stair loggia, would also be retained in its current configuration.

- The stacks in the north (McAllister Street) wing of the old Main Library building would be demolished, as with the project, and converted to other uses.
- The Full Preservation Alternative would combine the former stacks area with the existing north light court to gain additional floor space. The south light court would be used as

interior space at the ground floor, and would remain an open courtyard at the second floor and up.

Under this alternative, the basement (lower level) would contain the same program and occupy the same space as under the proposed project. The lower level addition on the northeast (45 Hyde Street) portion of the site would be constructed as proposed.

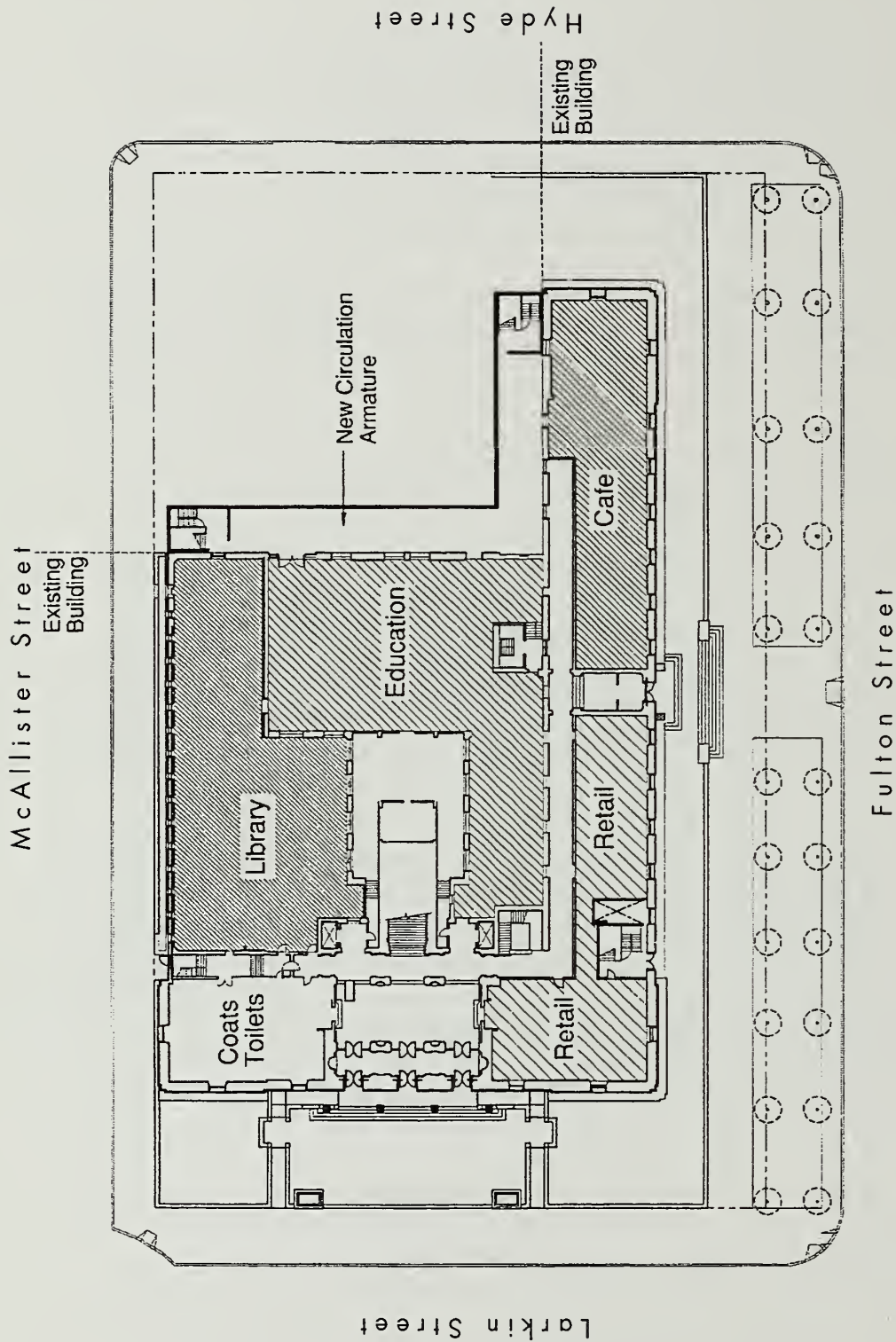
The ground floor (see Figure 12) would contain functions that do not require ticketing, including Lobby/Entry; Existing Elevators, Main Stair and Ornamental Stairs; Museum Store, with direct access to the Entry Lobby to encourage visits before or after visiting galleries; Café, Lounge and Kitchen; Resource Center & Classrooms; and Museum Library. Much of the interior beyond those Exceptionally Significant Interior Spaces described above would also be retained, including most of the former Children's and Fine Arts Rooms and the corridor outside them, compared with the project, which would demolish most ground floor spaces.

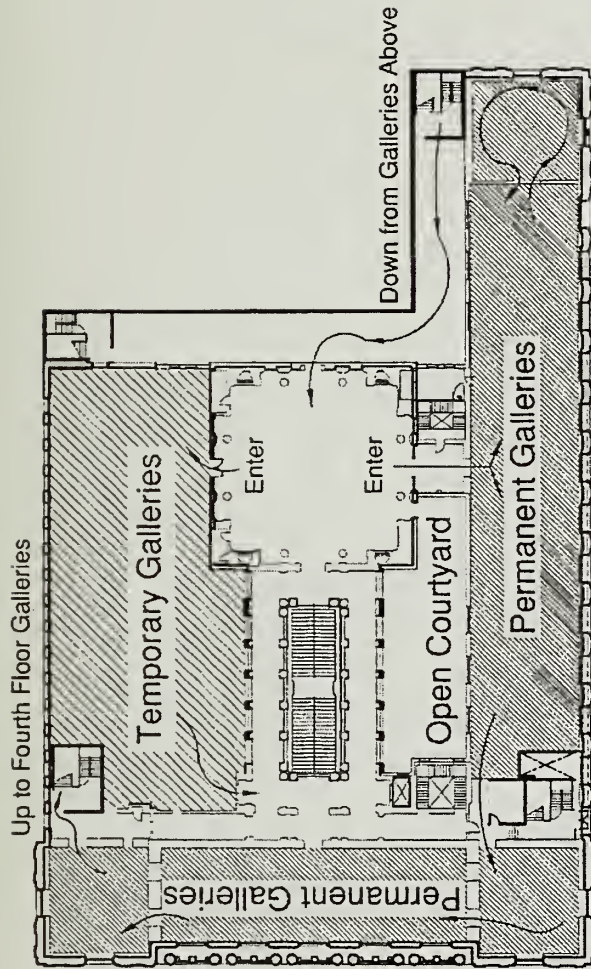
On the second floor (see Figure 13, p. 103), queuing, ticketing, and access to galleries would be provided in the Great Hall, reached via the Monumental Staircase. The Great Hall would thus retain its historic function as a central gathering and dispersal space for building visitors. Visitors would proceed south from the Great Hall into permanent collection galleries in the large reading rooms. Proceeding north from the Great Hall would lead one to temporary-exhibition galleries. Disabled persons would gain access to this floor from one of the elevators in existing locations. Identification of ticketed visitors would be through the use of lapel pins obtained at the Great Hall.

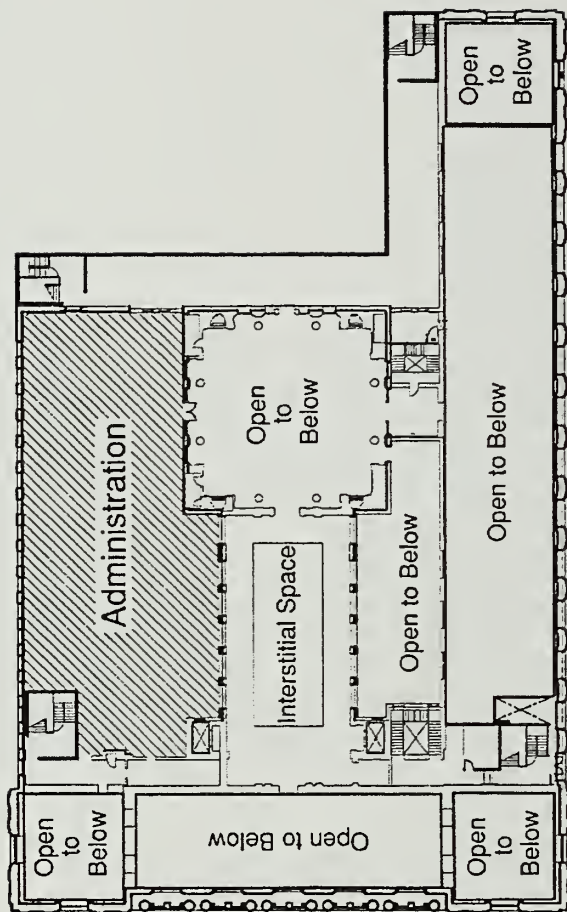
One-way traffic through the temporary-exhibition galleries would end at the west side of the stair loggia, from where a visitor could descend the Monumental Staircase or move into the permanent galleries. One-way traffic through the permanent galleries would be via entry from the Great Hall on the second floor, proceeding clockwise through the monumental reading rooms to the northwest corner of the building. There, visitors would ascend a new stair that would be built in the former stacks to reach the fourth floor (present third floor), thence proceeding counter-clockwise through new galleries on the to the southeast corner of the building, and finally descending another new staircase to return to the Great Hall. (See description of new stairs below.)

A new partial third floor would be constructed only within the existing north stacks and existing north light court (see Figure 14, p. 104). Unlike the proposed project, no new floor level would be installed in the existing large reading rooms on the second floor. This partial third level would be used for administrative offices. It could be reached by the existing north elevator or either of two new stairs. The south light court space would be retained in an altered form, as an open or skylit space on the second floor, possibly as a small cafe or a sculpture gallery.

The fourth floor (see Figure 15, p. 105) would be at the level of the existing third floor. In the Full Preservation Alternative, this level would contain galleries and administrative office space.





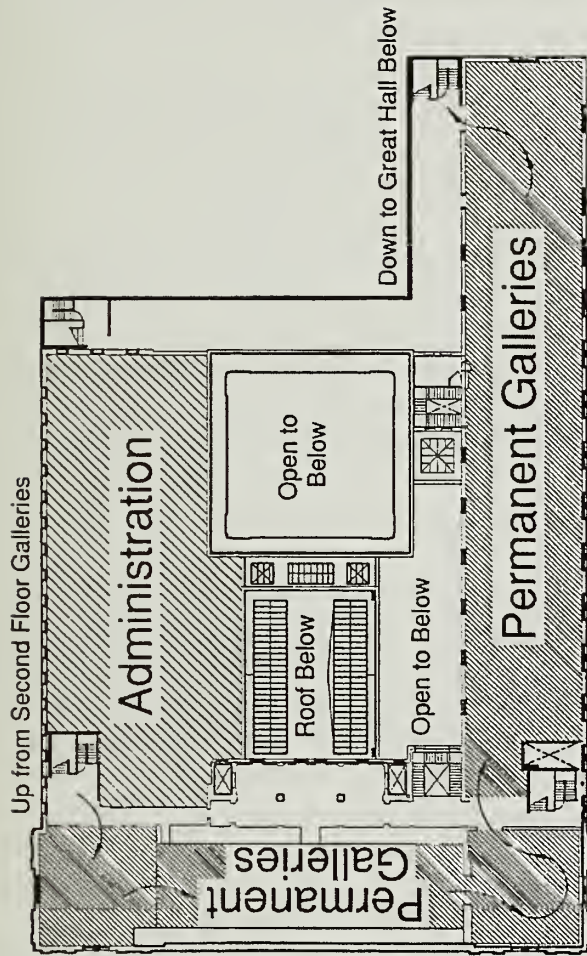


SOURCE: Page and Turnbull

97.750E Asian Art Museum / ESA 9704/19 ■

Figure 14

Preservation Alternative: Third Floor



SOURCE: Page and Turnbull

97.750E Asian Art Museum / ESA 970419 ■

Figure 15

Preservation Alternative: Fourth Floor

The current project would provide four new stairs inside the existing footprint of the building. The Full Preservation Alternative also would provide four new stairs, but two would be within the circulation armature on the northeast corner (45 Hyde Street portion) of the site, freeing existing interior space for museum uses. These new stairs would be connected by a new corridor at each level, also outside the existing old Main Library footprint (see Figure 12). The new stairs at the northwest and southeast corners would be designed and detailed generously to serve as part of the permanent gallery circulation sequence. This would allow the museum to program the visit to start in the Great Hall and proceed sequentially through the galleries, terminating at the east wall of the Great Hall, potentially retaining the circulation pattern desired by the museum. Retention of the original Ornamental Stairs would mean that visitors could deviate from the programmed sequence more than in the project design, however.

As with the proposed project, the Full Preservation Alternative would accommodate a future auditorium/theater addition at the 45 Hyde Street site and future extension of the McAllister Street wing of the old Main Library. (Should the latter be constructed, it would have to accommodate the circulation armature proposed with this alternative, and so, would lose some program space.) Entry to the auditorium/theater addition would be from Hyde Street and from the east wall of the Great Hall, reinforcing the role of that space as the nexus of public circulation.

IMPACTS

By maintaining most of the Exceptionally Significant Interior Spaces, as designated in Planning Code Article 10, in their existing condition, including the main entrance lobby, vestibule, north-south corridor and elevator lobbies on the main floor and the Monumental Staircase, stair loggia and Piazzoni murals, Great Hall, and two large reading rooms on the second floor, and by rehabilitating other Exceptionally Significant Interior Spaces following seismic upgrading work, the Full Preservation Alternative would avoid substantial adverse effects on most historic architectural features of the old Main Library building. Similarly, by not constructing the rooftop mechanical penthouse and screen, by maintaining the statues on the Larkin Street facade, and minimizing changes to existing windows, this alternative would reduce adverse effects on historic architectural resources, compared to the proposed project. Although it is not clear that this alternative would be in full compliance with the Secretary of the Interior's *Standards for Rehabilitation*, absent a more detailed design, particularly in regard to the building exterior, the Full Preservation Alternative would not adversely affect Exceptionally Significant Interior Spaces designated in Article 10 of the Planning Code, and therefore would not be anticipated to result in significant adverse effects on historic architectural resources.

Absent construction of the rooftop mechanical penthouse, the Full Preservation Alternative would also avoid a potentially significant effect on increased shadow on Civic Center Plaza. Although no detailed design of the HVAC system under this alternative is available, it is assumed that new shadow impacts would be substantially less than with the proposed project, and relatively closer to existing conditions than to conditions with the project.

Exterior changes would be somewhat less apparent than with the proposed project, principally because the Full Preservation Alternative would not include the hipped roof mechanical penthouse and screen.

Because the program under this alternative would be similar to that with the proposed project, effects related to transportation, air quality, and growth inducement would be similar to those of the project.

PROJECT SPONSOR'S REASONS FOR REJECTION

The project sponsor has rejected this alternative for the following reasons: Permanent gallery space would be substantially less, compared to the proposed project, which would result in less permanent gallery space than currently exists at the existing Asian Art Museum in Golden Gate Park. Gallery space on the fourth floor would have a floor-to-ceiling height of only 8'6" (assuming installation of the same HVAC duct system as currently proposed), which would preclude the placement of any tall exhibit pieces. This relatively low ceiling height would contrast with the approximately 30-foot ceiling height in the second floor permanent galleries under this alternative (with no installation of a new third floor level in the second floor reading rooms). Temporary gallery space on the second floor would also be substantially less than would be provided with the project as proposed. Use of the Great Hall under this alternative would eliminate the program requirement for overflow "blockbuster" exhibit space and revenue-producing events. The Great Hall could not be used as a lecture hall. This alternative would meet almost none of the project sponsor's objectives of transforming "dark, static areas . . . into dynamic, light filled spaces full of movement," and would not meet circulation or orientation objectives of the sponsor. In summary, the project sponsor believes that this alternative is not suitable for consideration from functional and funding viewpoints.

C. ALTERNATIVE C: REDUCED IMPACT ON HISTORIC ARCHITECTURAL RESOURCES

DESCRIPTION

This alternative would be the seismic upgrade and adaptive reuse of the old Main Library building for the Asian Art Museum, with reduced impacts on the historic resource. Alternative C would include some of the interior changes proposed with the project, but would avoid substantial alterations to most of the Exceptionally Significant Interior Spaces designated in Article 10 of the Planning Code. Specifically, this alternative would retain intact the second floor stair loggia (Room 290) and Corridor 291A, including the Piazzoni murals in Room 290. Rather than a new floor level as proposed with the project, this alternative would install a true mezzanine and/or self-contained two-story structure within the second floor reading rooms (Rooms 201, 202, 203, 210, and 218), instead of a new full floor as proposed with the project. Other Exceptionally Significant Interior Spaces would be retained, as they would with the proposed project, including the Main Entrance Lobby and Vestibule (Rooms 101 and 191); the Monumental Staircase (S101); and the Great Hall (Room 200). Exceptionally Significant Interior Spaces on the ground floor that would be demolished or substantially altered with this

alternative would include the two elevator lobbies (Rooms 192 and 193). To gain space lost, compared to the project, by the reduced changes to the two-story second floor rooms, this alternative would construct three additional stories above the lower level extension at 45 Hyde Street, the same building envelope as proposed in Phase 2 of the project. A mechanical penthouse would be constructed to hide rooftop heating, ventilation, air conditioning (HVAC) and other equipment, as with the proposed project. Base isolation and concrete shear walls would be constructed, similar to the seismic upgrade program with the project.

Under this alternative, the project would include a modified version of the proposed Central Court, which would serve many of the same functions as with the project as proposed. As with the project, the modified Central Court would function as the focal point for museum visitors, providing a place for gathering, spatial orientation, and queuing for ticket purchase, as well as a portal to some of the unticketed areas of the museum: the bookstore, cafe, and classrooms. Like the project, this alternative would demolish the elevator lobbies (Rooms 192 and 193) and Corridor 190 to provide a clear entry path to the modified Central Court. Unlike the project's three-story Central Court, the modified Court would be a two-story space, with a solid ceiling, rather than skylights. The north wall of the south reading room, including arched windows at the second level, would be retained intact. The south wall of the building's McAllister Street wing (former stacks) would be removed to open up the Central Court, as with the proposed project.

Similar to the project, this alternative would include demolition of most of the ground floor interior to accommodate temporary galleries, the museum store, a cafe, offices, and classrooms. Two existing ornamental stairs (S102, immediately south of the Monumental Staircase, and S104, between the Great Hall and large Fulton Street reading room) in the south wing would also be demolished, along with the existing elevators, as they would under the proposed project. Under this alternative, the project's proposed glass-enclosed stairway or escalators would not be built. New elevators and a new staircase would be constructed in the southeast corner of the Central Court to transport patrons to the permanent galleries in the second floor of the old Main Library building and second and third stories of the 45 Hyde Street addition; alternatively, the Monumental Staircase could be used to reach second floor galleries.

On the second floor, galleries would be constructed, as with the proposed project, but there would be no new full floor level added in the two primary and three smaller reading rooms. Instead, small mezzanines would be constructed or separate self-contained structures would be inserted into these spaces to display objects. No new openings would be cut into the exterior walls of the south reading room or of the stair loggia and, as noted, the Piazzoni murals would remain. The existing third floor would be remodeled, as with the project, to provide a research library and museum offices.

The 45 Hyde Street addition, with the same building envelope as Phase 2 of the proposed project, would include a new lower level, as proposed with the project, and three stories, at the same floor levels as those of the old Main Library building, to accommodate an auditorium on the first two

floors and gallery space on the third floor. Because it would accommodate some of the currently proposed gallery space at 45 Hyde Street, this alternative would preclude some of the future expansion space anticipated as Phase 2 of the proposed project. Figures 16 through 19, pp. 109a-109d, depict floor plans for Alternative C.

IMPACTS

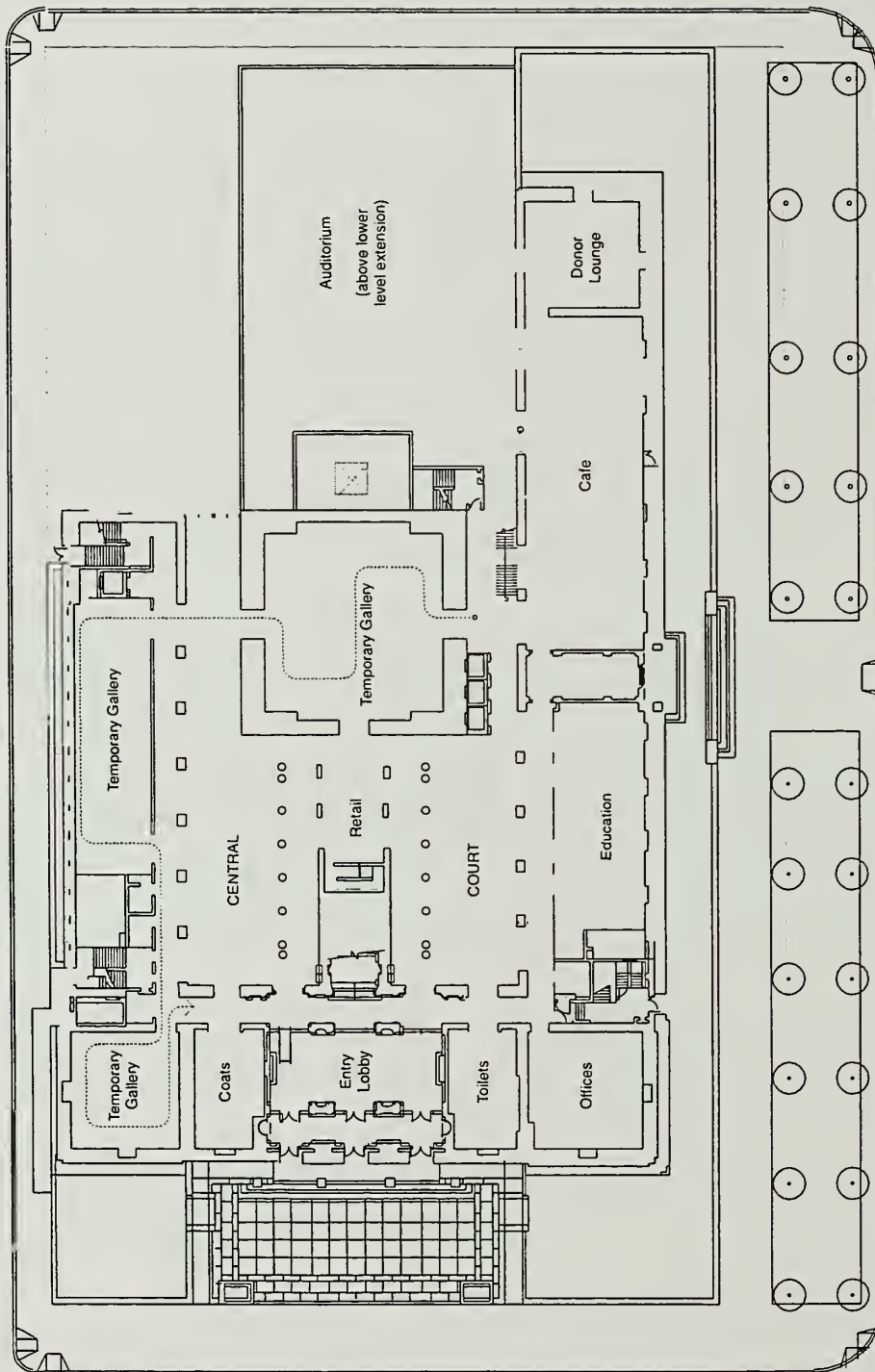
Effects on historic architectural resources would be less substantial than with the proposed project, because this alternative would include fewer changes to the Exceptionally Significant Interior Spaces designated in the Planning Code. Notably, and in contrast to the proposed project, this alternative would retain the second floor stair loggia (Room 290) and Corridor 291A, including the Piazzoni murals in Room 290, and would not install a new full floor level in the second floor reading rooms (Rooms 201, 202, 203, 210, and 218). Mezzanines and/or self-contained structures within these large double-height spaces would have less effect on a viewer's perception of these monumental spaces than the full floor level proposed with the project, and could be more easily removed in the future, if desired. To accommodate museum functions, this alternative would also demolish some Exceptionally Significant Interior Spaces on the ground floor, and therefore would result in a significant effect on historic architectural resources. This alternative would not fully comply with the Secretary of the Interior's *Standards for Rehabilitation*.

Shadow impacts are assumed to be similar to those of the proposed project, as this alternative assumes construction of a comparable rooftop mechanical penthouse and envelope at 45 Hyde Street.

Because the fundamental elements of the museum program under this alternative would be the same as with the proposed project, effects related to transportation, air quality, and growth inducement would be similar to those of the project.

PROJECT SPONSOR'S REASONS FOR REJECTION

The project sponsor has rejected Alternative C for the following primary reasons. As in Alternative B, the permanent gallery spaces would be of different heights, and floor levels in 45 Hyde Street and the old Main Library building would not be in alignment. The sponsor believes these varying heights would create circulation problems. In the sponsor's view, this alternative also would not accomplish the program objective of relating the path of travel to the origin and spread of Buddhism in that Buddhism is a common thread throughout Asian Art, and would preclude future expansion necessary for the long term viability of the museum. In summary, the project sponsor is of the opinion that this alternative is not suitable for consideration from functional, architectural and funding viewpoints.

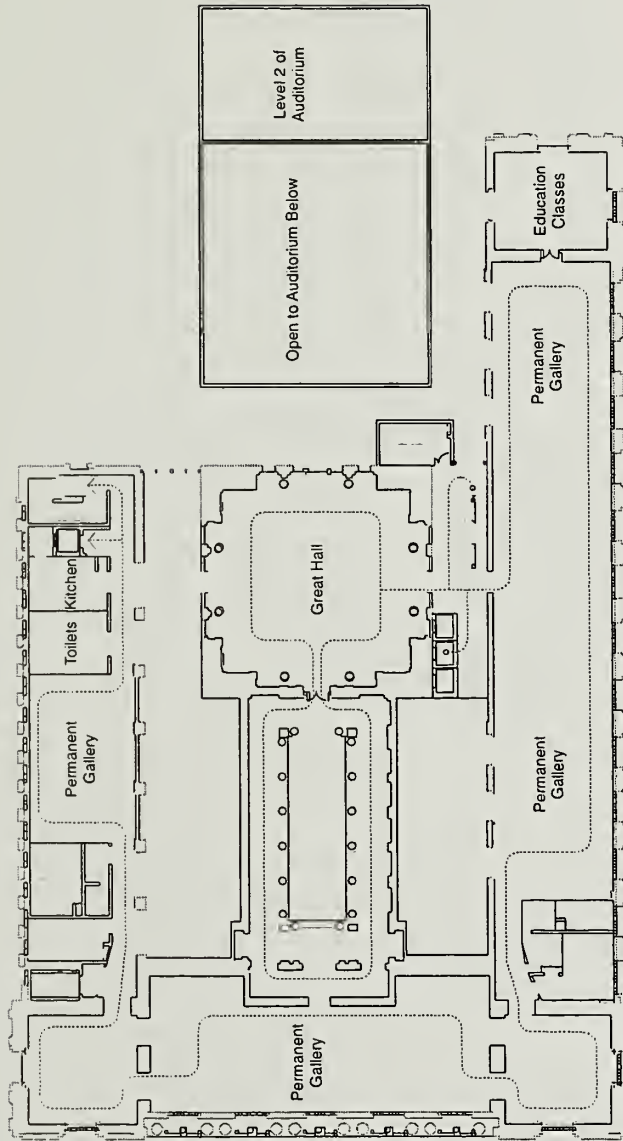


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Feet

SOURCE: HOK/LDA/RWA

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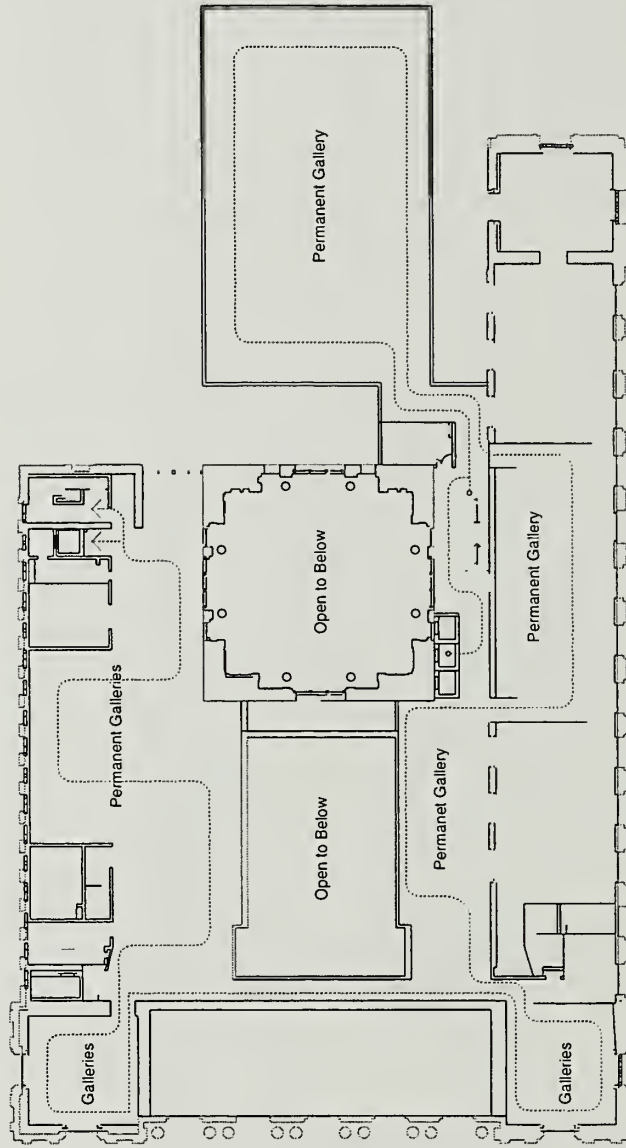
Figure 16 •
Reduced Impact Alternative C
First Floor



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SOURCE: HOK/LDA/RWA

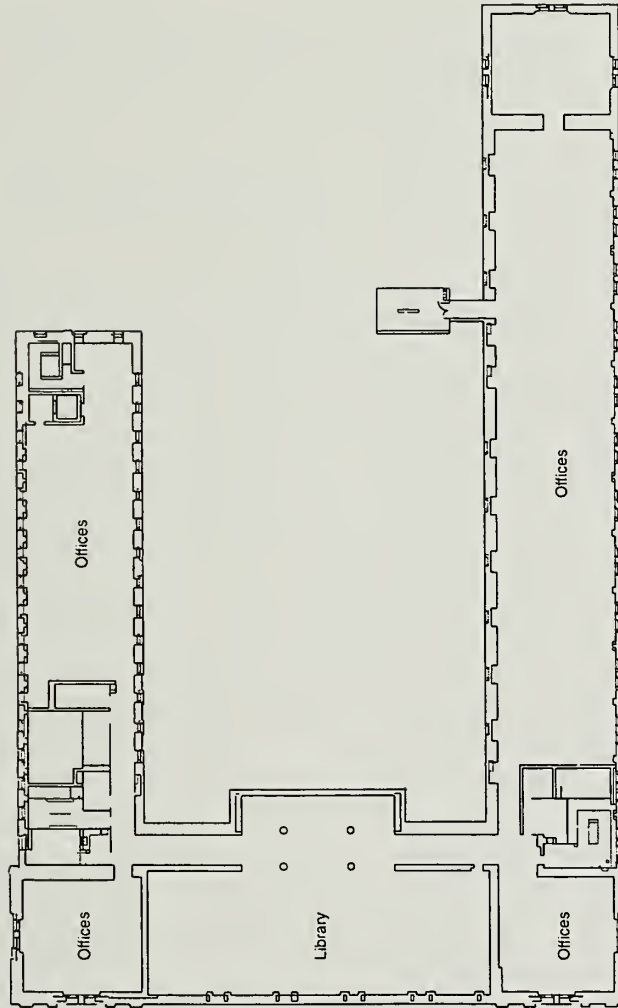
Figure 17 •
Reduced Impact Alternative C
Second Floor



SOURCE: HOK/LDA/RWA

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Figure 18 •
Reduced Impact Alternative C
Third Floor



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Feet

SOURCE: HOK/LDA/RWA

97.750E Asian Art Museum / ESA 970419 ■

Figure 19 •
Reduced Impact Alternative C
Fourth Floor

REFERENCES - Alternatives

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, as part of the project file.

Rutherford & Chekene, 1992, *Seismic Upgrading Study of the Main Public Library Building, San Francisco, California, for the Asian Art Museum at the Civic Center*, September.

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Ellen Johnc
Bay Planning Coalition
303 World Trade Center
San Francisco, CA 94111

Cushman & Wakefield of California, Inc.
Bank of America Center
555 California Street, Suite 2700
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Attn: Wayne Stiefvater, Lawrence Farrell

Damner Pike & Co.
345 California Street, Suite 2100
San Francisco, CA 94104
Attn: Charles McCabe

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San Francisco, CA 94111
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Food and Fuel Retailers For Econ. Equality
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Attn: Doug Stevens, State Coordinator

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Attn: Steven L Vettel

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Attn: Jacob Herber

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601 California Street, Suite 1400
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295 Eddy Street
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Attn: Allman Richard, Exec. Director

North of Market Senior Services
333 Turk Street
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Attn.: George W. Friou, Exec. Director

Pacific Exchange
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San Francisco, CA 94104
Attn: Dale Carleson

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400 Second Street, Suite 400
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Attn: Marie Zeller

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Attn: Christopher Scales

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Attn: Marilyn L. Siems

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Attn: Peter Bass

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Reuben & Alter
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UCSF Capital Planning Department
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Attn: Bob Rhine

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San Francisco, CA 94111-5994

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244 California Street, Suite 500
San Francisco, CA 94111
Attn: Thomas N. Foster

Royal Lepage Cmrc'l. Real Estate Svcs.
353 Sacramento Street, Suite 500
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Attn: Richard Livermore

Keith Werner
St. Anthony's Foundation
121 Golden Gate Avenue
San Francisco, CA 94102

S.F. Bldg. & Constr. Trades Council
2660 Newhall Street, #116
San Francisco, CA 94124-2527
Attn: Stanley Smith

San Francisco Chamber of Commerce
465 California Street
San Francisco, CA 94104
Attn.: Karen Alatia, Pub. Affairs Asst.

San Francisco Conv. & Visitors Bureau
201 - 3rd Street, Suite 900
San Francisco, CA 94103
Attn: John Marks, Exec. Director

San Francisco Labor Council
660 Howard Street
San Francisco, CA 94105
Attn: Walter Johnson

San Franciscans for Reasonable Growth
243 Bartlett Street
San Francisco, CA 94110
Attn: David Jones

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San Francisco, CA 94109

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San Francisco, CA 94104

Shartsis Freise & Ginsburg
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San Francisco, CA 94111
Attn: Dave Kremer

Skidmore, Owings & Merrill
333 Bush Street
San Francisco, CA 94104
Attn: John Kriken

Solem & Associates
545 Mission Street
San Francisco, CA 94105
Attn: Olive Lewis

Square One Film & Video
725 Filbert Street
San Francisco, CA 94133

Steeffel, Levitt & Weiss
199 First Street
San Francisco, CA 94105
Attn: Robert S. Tandler

Tenants and Owners Development Corp.
230 - Fourth Street
San Francisco, CA 94103
Attn: John Elberling

TRI
100 Pine Street, Suite 2300
San Francisco, CA 94111
Attn: Mathew Cappiello

Jerry Tone
Montgomery Capital Corp.
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San Francisco, CA 94111

Jon Twitchell Associates
4419 Moraga Ave.
Oakland, CA 94611

Stephen Weicker
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San Francisco, CA 94108

Calvin Welch
Council of Commun. Housing Orgs.
409 Clayton Street
San Francisco, CA 94117

West Bay Filipino Multi-Serv. Corp.
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Attn.: Edwin Jocson

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San Francisco, CA 94104

Eunice Willette
1323 Gilman Avenue
San Francisco, CA 94124

Bethea Wilson & Associates
Art In Architecture
2028 Scott, Suite 204
San Francisco, CA 94115

NEIGHBORING PROPERTY OWNERS AND OCCUPANTS

0347/003, 004

0348/009

Hastings College of the Law
399 Golden Gate Avenue
San Francisco, CA 94102

0347/005

Imperial Savings
700 N. Central Avenue, Suite 100
Glendale, CA 91203-1240

0347/005

Occupant
246 McAllister Street
Apts. 1-16
San Francisco, CA 94102

0347/006

McAllister Street Assoc. LLC
201 Eddy Street
San Francisco, CA 94102-2715

0347/006

Occupant
250 McAllister Street
Apts. 1-35
San Francisco, CA 94102

0347/006A

Tenderloin Neighborhood Dev. et. al.
201 Eddy Street
San Francisco, CA 94102-2715

0347/006A

Occupant
260 McAllister Street
Apts. 101-5; 201-6; 301-6; 401-6; 501-6
San Francisco, CA 94102

0347/007

Jay-Mitsu-Vipin Partnership
1213 W. El Camino Real
Sunnyvale, CA 94087-1028

0347/007

Occupant

272 McAllister Street
Apts. 1-87
San Francisco, CA 94102

0347/008

0354/001

0765/001

San Francisco Real Estate Department

0351/022

Productions of San Francisco
555 California Street, Suite 1425
San Francisco, CA 94104-1517

0351/022

Occupant
1182 Market Street
Suites 203, 204, 210-1, 210-2,
211, 214, 306-1, 306-2, 320,
410, 415, 425
San Francisco, CA 94102

0351/022

Occupant
1198 Market Street
San Francisco, CA 94102

0762/002

General Services Administration
Buildings and Grounds
301 Howard Street
San Francisco, CA 94105

CHAPTER VIII

SUMMARY OF COMMENTS AND RESPONSES

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SECTION A

INTRODUCTION

This document contains public comments received on the Draft Supplemental Environmental Impact Report (Draft SEIR, or DSEIR) prepared for the proposed Asian Art Museum project, and responses to those comments. Also included in this document are staff-initiated text changes, and materials to be added in the SEIR appendices.

Following this introduction, Section B contains a list of persons and organizations who submitted written comments on the Draft SEIR and who testified at the public hearing on the Draft SEIR held on August 20, 1998.

Sections C and D contain the comments and responses. Comments are grouped by commenter, rather than by topic, to allow commenters to easily find the responses to their comment(s). As the subject matter of one comment may overlap that of others, the reader may be referred to another response.

Section C contains comment letters received during the public review period from July 18 to August 20, 1998, and the responses to each comment. Each substantive comment on the SEIR is labeled with a number in the margin and the response to each comment is presented immediately after the letter containing that comment.

Section D contains transcribed comments made at the public hearing on the Draft SEIR and the responses to each of those comments. Each substantive comment on the SEIR is similarly labeled with a number in the margin, and the responses to each set of comments follow those comments.

Section E contains text changes to the Draft SEIR made by the SEIR preparers subsequent to publication of the Draft SEIR to correct or clarify information presented in the DSEIR.

Section F of the published Draft Summary of Comments and Responses contained graphics and other material that were added to the SEIR; those materials have been incorporated into this Final SEIR.

Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision makers.

These comments and responses will be incorporated into the Final SEIR as a new chapter. Text changes resulting from comments and responses will also be incorporated in the Final SEIR, as indicated in the responses.

KEY ISSUES RAISED BY COMMENTERS

Several specific issues were raised by more than one commenter. To enable the reader to more easily locate these topics, they are listed in the table below, along with the page number of the principal response(s) that address the topic.

<u>TOPIC</u>	<u>RESPONSES</u>
Removal of Piazzoni Murals	B-8, p. C&R.27 F-6, p. C&R.50 F-10, p. C&R.54 F-20, p. C&R.57 J-5, p. C&R.80
Removal of DuMond Murals	F-7, p. C&R.52
Effects on Historic Districts	A-4, p. C&R.14
Effects of Proposed Seismic Upgrade on Loggia	F-10, p. C&R.54 J-4, p. C&R.78
Effects of Seismic Upgrade, More Generally	F-11, p. C&R.55 L-3, p. C&R.102
Effects of Seismic Moat	B-2, p. C&R.24
Graphics Presented in Draft SEIR	Page C&R.5 Section F, p. C&R.150
Alternatives, Project Sponsor's Rejection of	J-7, p. C&R.83

SECTION B

LIST OF PERSONS COMMENTING

Written Comments

Federal

David W. Look, AIA, Cultural Resources Team Leader, Pacific Western Region, National Park Service, letter, August 18, 1998

State

Daniel Abeyta, Deputy State Historic Preservation Officer, State Office of Historic Preservation, California Department of Parks and Recreation, letter, August 19, 1998

Leigh Jordan, Coordinator, California Historical Resources Information System, letter, July 27, 1998

David Seward, Chief Financial Officer, Hastings College of the Law, letter, August 20, 1998

Local

Leland Y. Yee, Ph.D., Member, San Francisco Board of Supervisors, letter, August 20, 1998

Daniel F. Reidy, President, San Francisco Landmarks Preservation Advisory Board, letter, August 17, 1998

Debra Lehane, Civic Art Collection Manager, San Francisco Art Commission, letter, August 10, 1998

James D. Lowé, Transit Planner, San Francisco Municipal Railway, letter, July 22, 1998

Organizations

Julie Hatta, Producer, Asian Improv aRts, undated letter (received August 20, 1998)

Kelly L. Drumm, Counsel for the Foundation for San Francisco's Architectural Heritage, letter, August 20, 1998

Jules Levaggi, President, and Winchell T. Hayward, Vice President, California Heritage Council, letter, August 20, 1998

Mrs. Bland Platt, G. Bland Platt Associates, letter, August 17, 1998

Individuals

Tsuyako "Sox" Kitashima, letter, August 20, 1998

Milton Marks III, letter, August 20, 1998

Collette Tanaka, letter, August 15, 1998

Thomas Wood, letter, August 16, 1998

Public Hearing Comments, August 20, 1998

David Bahlman, Executive Director, Foundation for San Francisco's Architectural Heritage

James Fang, President, *Asian Week*

Sylvia Hom

Alice Lowe, member, Asian Art Commission, and Asian Art Museum docent

Robert Allen, Asian Art Museum docent

James Haas, Chairman, Civic Pride

Enid Lim

Sidney Kass, Asian Art Museum docent

Judy Wilbur, member, Asian Art Commission; trustee, Asian Art Museum

Jim Brady, Asian Art Museum docent

Sally Kirby, Asian Art Museum docent

Wai Ching Kwan, Chinese Community Development Center

Colette Tanaka, [art] collections manager

Craig Addelman, Tenderloin Neighborhood Development Corporation

Sox Kitashima

Mary Anne Miller, board member, San Francisco Tomorrow

Winchell Hayward, California Heritage Council

Michael Levin

Bao Yan Chan

Dennis Antenore, member, San Francisco Planning Commission

Richard Hills, member, San Francisco Planning Commission

SECTION C

WRITTEN COMMENTS AND RESPONSES

This chapter includes copies of the comment letters received during the public review period on the Draft SEIR and responses to those comments. Each substantive comment on the Draft SEIR is labeled with a number in the margin and the response to each comment is similarly numbered and presented after the letter containing that comment. Where responses include changes to the text of the Draft SEIR, these changes will also appear in the Final SEIR.

GENERAL RESPONSE REGARDING THE LEVEL OF DETAIL IN THE DRAFT SEIR

A number of commenters raised issues concerning the level of detail in the Draft SEIR's description of the project and analysis of impacts concerning historic architectural resources. In response, it should be noted that the Draft SEIR fulfills the requirements of CEQA in that it contains sufficient information and analysis to conclude that the project would have a significant effect on historic architectural resources. The project, its components, and the nature of this significant effect are described, along with mitigation measures and alternatives that would reduce or eliminate the effect. The Draft SEIR summarizes and incorporates by reference the *San Francisco Main Library* Final EIR (Case No. 90.808E; certified February 27, 1992, and referred to as the "Main Library/Asian Art Museum FEIR"); an Addendum to the FEIR dated May 1, 1996; detailed information in reports prepared by the project's preservation architect, Page & Turnbull, and by Carey & Co. in an earlier historic architectural *Building Evaluation Report*; and other documents. These materials are available to decision-makers and the public, as described in the Draft SEIR. Please see also the response to Comment F-2, p. C&R.46, for additional discussion of the level of detail required in the SEIR.

To assist the reader and respond to requests for additional illustrations, the following graphics have been provided. Except as noted below, these graphics are available for public review elsewhere in the background materials, and do not constitute new information or analysis regarding physical environmental impacts. These graphics do not change the conclusions of the Draft SEIR. (Note that the newly added graphics are numbered based on their placement within the SEIR; for example, Figure 10A is inserted between Figures 10 and 11, but is not related to Figure 10):

- Figures 8A through 8D, "before and after" interior elevations of Rooms 201 and 210, the main second floor reading rooms (available in the project sponsor's application for a Certificate of Appropriateness);

- Figure 9A, an additional rendering, similar to SEIR Figure 9 (renderings of the proposed Central Court from ground level), but with a view from above (from the Certificate of Appropriateness application);
- Figures 10A and 10B, full-wall photographs of the Piazzoni murals on the north and south walls of the second floor stair loggia (provided by the San Francisco Art Commission);
- Figure 10C, a visual simulation of the proposed project's Larkin Street facade (from the Certificate of Appropriateness application);
- Figure 10D, a visual simulation of the proposed project and the new Main Library side-by-side, to illustrate the effect of the proposed hipped roof mechanical penthouse (note that figures depicting the proposed project, in both plan and elevation views, are provided in the Draft SEIR);
- Figures 10E, 10F, 11A, 11B, and 11C, interior photosimulations of the main reading rooms converted to two stories of galleries, the second floor loggia with the Piazzoni murals removed, the main stair, and main entry hall (from the Certificate of Appropriateness application);
- Figures 16 through 19, graphical representation of floor plans of Alternative C, Reduced Impact On Historic Architectural Resources (prepared by the project architect);
- Figures A-1 to A-3, exterior photographs of the old Main Library building, existing conditions (similar photographs are also available in the Main Library/Asian Art Museum FEIR; Figure A-1 appears in DSEIR Appendix A); and
- Figures A-4 through A-12, interior photographs of Article 10-listed Exceptionally Significant Interior Spaces proposed for alteration – ground floor elevator lobby, main second floor reading rooms (including DuMond murals), second floor stair loggia (including Piazzoni murals and inscriptions), and Great Hall (Room 200). Other Article 10-listed features, which would be retained, are also depicted, including the Monumental Staircase and ground floor Corridor 190 (most photographs are also available in the Page & Turnbull *Historic Structure Report*, the rest from the SEIR environmental consultant);

In addition, some minor revisions have been made in the elevations for the proposed project (DSEIR Figures 3, 4, and 5) to reflect development of the design for the Chinese garden, which is now proposed to be surrounded by a granite wall, rather than a metal fence. The existing floor plans that identify existing room numbers in the old Main Library building, included in the DSEIR Appendix A, following the Page & Turnbull matrix, are replaced with more legible plans that also identify Article 10 Exceptionally Significant Interior Spaces and the historic architectural importance of other interior spaces. In addition, floor plans of the proposed project, denoting areas of the museum by use, have been added to the SEIR to supplement Figures 6 through 8.

Regarding the existing setting, including the history of the San Francisco Civic Center, this Supplemental EIR incorporates information included in the Final EIR for the San Francisco Main Library (Case No. 90.808E, Final EIR Certified February 27, 1992), and the Addendum to that FEIR, dated May 1, 1996. As stated on p. 50 of the DSEIR, the setting section in the DSEIR “summarizes and updates the Setting discussion in the Main Library/Asian Art Museum FEIR (pp. 52-64), which is incorporated by reference.”



United States Department of the Interior

NATIONAL PARK SERVICE

Pacific West Region
600 Harrison Street, Suite 600
San Francisco, California 94107-1372



LY REFER TO:

34 (PGSO-PC)

August 18, 1998

Ms. Hillary E. Gitelman
Environmental Review Officer
Planning Department
100 Mission Street, 6th Floor
San Francisco, CA 94103-2414

Re: Final Supplemental Environmental Impact Report for the Asian Art Museum Project
(Case No. 97.750E)

Dear Ms. Gitelman:

The National Park Service (NPS) has reviewed the Draft Final Supplemental EIR for the Asian Art Museum, a property within the boundaries of the San Francisco Civic Center National Historic Landmark. NPS has the role of providing technical assistance to owners of National Historic Landmarks, additionally, the City of San Francisco is a Certified Local Government, so NPS provides these comments to a partner in the preservation of historic resources.

NPS is satisfied that the document presents enough information to make the following determinations. The Full Preservation Alternative appears to meet the Secretary of the Interior's Standards for Rehabilitation (Standards). From the descriptions contained in the document, it appears that significant exterior and interior features, spaces, and finishes would not be substantially altered. NPS is aware that this alternative would require adjustments in the program of utilization but it does not appear that the alternative would be physically infeasible. This alternative is the NPS preferred treatment.

It appears that the Reduced Impact on Historic Architectural Resources Alternative, could not meet the Standards. Because full design details were not included NPS is not able to fully assess the impact of this alternative. While this alternative describes more aggressive intervention, it does not appear that all of the significant features, spaces, and finishes would be substantially altered. There are some areas that would be affected, but it is possible that the treatment could be such that the impacts could be further reduced. For this

1

2

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reason, it appears this alternative could meet the Standards.

The Asian Art Museum's Preferred Proposed Project, if carried out as described, would not meet Standards 1, 2, 3, 4, 5, and 9 (See copy enclosed). For a project to meet the Standards all aspects of the project must meet all of the Standards.

The cumulative effects of the changes being proposed for the exterior and interior would not meet Standard 1, which requires minimal amount of change in adapting a building to a new use. It is possible to meet the needs of the adaptive reuse for the building and meet the Standards as the Preservation Alternative demonstrates. The Preferred Project requires the alteration, destruction, or removal of significant character-defining features such as the roofline, spaces such as the catalog and reading rooms, and finishes such as the murals and travertine walls on both the exterior and the interior. If a project requires such significant kinds of intervention, then NPS can only conclude that the proposed use of the building is not in accord with Standard 1.

The addition of rooftop screening in the form of a metal Mansard roof for the additional HVAC systems substantially alters the flat roof of the building. While other buildings in the Civic Center Historic District have Mansard roofs, which is appropriate to their design sources found in the French Baroque style, this building, based on Italian palazzi, does not have such a roof. To add such a roof would create a new roofline not only incongruent with its original design but also a false historic appearance by causing it appear contemporaneous with the other Civic Center buildings of later date because of the similarity in design. Such a treatment is not in accord with Standards 2 and 3, which require the retention of characteristic features and the avoidance of creating a false appearance for a building.

There are other exterior treatments which do not meet the Standards: the removal of the statues on the west facade; the changes in the glazing in both the clathri style windows and on the McAllister Street elevation; the addition of the number of doors on the Fulton Street elevation; removal of the round arched windows on the north elevation of the Fulton Street wing; and the removal of the brick and stuccoing of the east elevation. These kinds of treatments, which are design requirements, do not meet Standards 1 and 2 because they alter significant character-defining features or remove historic fabric.

On the interior, the removal of the amount of historic fabric in all of the spaces does not meet Standard 2 which requires the retention of character-defining features and spaces, and historic fabric. The changes to the circulation with the isolation of the main staircase, removal of the walls, elevators, and changes to the corridors on both the first and second floors does not meet the Standard. The proposed new finishes for many of these

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Page 3

spaces, while not fully described, do not appear to be compatible to the existing wood, marble, travertine, and faux travertine finishes.

The insertion of floors in the major reception and reading spaces does not meet Standards 1, 2, and 5, which require the retention of features, spaces, and historic finishes. These spaces are the major character-defining features of the library and the insertion of additional floors and removal of walls radically alters the perception of the original nature of the spaces. Additionally, the partial insertion of an elevator in a corner of the catalog room would cause the additional loss of historic fabric. The removal of the walls on the north side of the south reading room and addition of bridges would be a substantial change in the spatial relationship of the room to the staircase and corridor plan.

The removal of the Piazzoni Murals does not meet Standard No. 4, which requires the retention of changes which have acquired significance over time. While they were not a part of the original design for the Library, the murals were created for their current positions along the staircase and have acquired historic significance in their own right. Their removal would cause them to lose an important quality, their siting.

The construction of additions on the east elevations, while not fully developed at this time, would cause the further removal of historic fabric and changes to the historic windows which does not meet Standards 2 and 9. Standard 9 requires new additions, alterations, or related new construction to retain historic materials that characterize the property. The new additions will have an impact on the north side of the Fulton Street Wing, and McAllister Street Wing and the east wall of the center portion. There is little specific information about the design of the new additions, but they have the potential to be incompatible in scale with the historic building, therefore, NPS cannot comment on the design but the method of attachment may not meet Standard 10, which requires new additions to be reversible leaving the essential building form intact.

Finally, NPS would like to address the comments on page 71. NPS disagrees with the statements that the changes on the exterior and the interior would not substantially affect the historic or architectural significance of the district. Such changes are substantial and would very severely impact the integrity of the building. Because every elevation of the building would be altered, the roofline would be changed, substantial amounts of historic material would be removed from the interior, and the major character-defining features of the interior spaces would be irretrievably altered, the building would no longer have the ability to contribute to the significance of the National Historic Landmark District. NPS would recommend the removal of the building from the list of contributing structures to the historic

3
Cont.

4

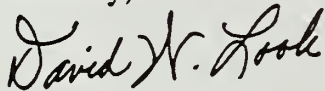
H34 (PGSO-PC)

Page 4

significance of the district as it would no longer convey the architectural designs of George Kelham.

Thank you for this opportunity to comment on such an important resource. Please feel free to call if you have any questions or would like to discuss our comments at (415) 427-1401.

Sincerely,

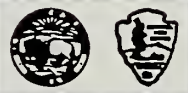


David W. Look, AIA
Cultural Resources Team Leader

cc:
SHPO-CA, attn: Carol Roland
WASO-TPS, attn: Susan Escherich
Dan Reidy, President, Landmarks Preservation Advisory Board, Planning Department, 1660
Mission Street, San Francisco, CA 94103-2414
President Hector Chinchilla, San Francisco Planning Commission, c/o Linda Avery, 1660
Mission Street, San Francisco, CA 94103-2414
Dr. Emily J. Sano, Director, Asian Art Museum, Golden Gate Park, San Francisco, CA
94118

-ly, 1996

Revised 1990



**U.S. Department of the Interior
National Park Service
National Center for Cultural Resource
Stewardship & Partnerships
Heritage Preservation Services
Washington, DC**

The Secretary of the Interior is responsible for establishing standards for all national preservation programs under Departmental authority and for advising federal agencies on the preservation of historic properties listed in or eligible for listing in the National Register of Historic Places.

The Standards for Rehabilitation address the most prevalent historic preservation treatment today: rehabilitation. Rehabilitation is defined as the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values.

The Secretary of the Interior's Standards for Rehabilitation

The Standards that follow were originally published in 1977 and revised in 1990 as part of Department of the Interior regulations (36 CFR Part 67, Historic Preservation Certifications). They pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and the interior of historic buildings. The Standards also encompass related landscape features and the building's site and environment as well as attached, adjacent or related new construction.

The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

LETTER A – NATIONAL PARK SERVICE

- A-1) The comment is noted. The SEIR states (p. 106), “Although it is not clear that this alternative [Alternative B, the Full Preservation Alternative] would be in full compliance with the Secretary of the Interior’s *Standards for Rehabilitation*, absent a more detailed design, particularly in regard to the building exterior, the Full Preservation Alternative would not adversely affect Exceptionally Significant Interior Spaces designated in Article 10 of the Planning Code, and therefore would not be anticipated to result in significant adverse effects on historic architectural resources.” As stated by the commenter, the SEIR provides sufficient information to support this conclusion, and as indicated in the commenter’s remarks, and those from the State Office of Historic Preservation (SHPO) (see Comment Letter B), the SEIR’s conclusion remains valid.
- A-2) The comment is noted. As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, Figures 16, 17, 18, and 19, depicting Alternative C, Reduced Impact on Historic Architectural Resources, have been added to the SEIR (pp. 109a-109d). They show plan views of each floor (the free-standing structures within those rooms are not shown but could be variously configured within the space). As described on p. 109 of the SEIR, this alternative would preserve most important features of the old Main Library building’s interior; it would, however, demolish the ground-floor elevator lobbies, which are designated Exceptionally Significant Interior Spaces in Article 10 of the San Francisco Planning Code. Therefore, while this alternative would have substantially less adverse effect on historic architectural resources than would the project, its impact would still be significant. That conclusion notwithstanding, it is possible that the National Park Service and the SHPO could find that Alternative C would meet the Secretary’s *Standards*, as indicated by the comment. As described in the SEIR, this alternative would include most exterior changes of the project, including the new roof element. As indicated by the comment that this alternative could meet the Secretary’s *Standards*, there is some room for interpretation in the *Standards*.
- A-3) The exterior and interior changes identified by the commenter are fully described in the Draft SEIR (see Chapter I, Summary; Chapter II, Project Description; and Chapter III, Environmental Setting and Impacts). As stated on SEIR pp. 58-59, the National Park Service uses the Secretary’s *Standards* and Guidelines in reviewing federal projects that involve Historic Properties, and the Park Service and SHPO also use the Secretary’s *Standards* and Guidelines in determining eligibility of rehabilitation projects for federal tax credits; neither situation is applicable to the proposed project. The SEIR’s assessment of impacts is not based on whether the project would meet the Secretary’s *Standards*, although the SEIR does describe physical changes relative to whether those changes would be consistent with the *Standards*, as evaluated by Page & Turnbull, the preservation architect for the project. Throughout the impacts analysis in Section III.A, on pp. 59-69, the SEIR includes excerpts from the Page & Turnbull evaluation (Page & Turnbull, 1998) of the project against the Secretary’s *Standards* and the Guidelines for implementation of the *Standards*, as well as the entire Page & Turnbull evaluation matrix, which is included in SEIR Appendix A. The SEIR concludes on p. 70 that the project would have a

significant effect on historic architectural resources, “in that it would demolish most of the interior of the old Main Library building, including a number of spaces identified as Exceptionally Significant Interior Spaces in the Planning Code (Appendix J of Article 10 (Sec. 10)).”

- A-4) Like the previous Main Library/Asian Art Museum FEIR, the SEIR reaches a conclusion that the project would have a significant, unavoidable adverse effect on historic architectural resources in that, as stated on p. 70, the project would demolish most of the interior of the old Main Library building, including a number of spaces identified as Exceptionally Significant Interior Spaces in the Planning Code (Appendix J of Article 10 (Sec. 10)).

The National Park Service (NPS) and the State Historic Preservation Officer (SHPO; see Comment Letter B, p. C&R.19) oppose implementation of the Asian Art Museum project as currently proposed, and have stated in their comments on the Draft SEIR that the project would adversely affect the status of the old Main Library building within the two federal historic districts by changing the building such that its contributory status within the districts would be called into question.¹ These statements are consistent with the overall conclusion of the DEIR, that the changes proposed would result in a significant effect on historic architectural resources, but are at odds with the text on p. 71 of the Draft SEIR, which states:

Exterior alterations would not substantially affect the historic or architectural significance of the local and national historic districts in which the old Main Library building is considered contributory. Interior changes would not be expected to affect the building’s contributory status within these districts, or substantially alter the character of the districts. For these reasons, project effects on the historic districts would not be considered significant.

The SEIR preparers believe that the above SEIR statement is accurate, and that the threatened elimination of the old Main Library building’s contributory status within the federal historic districts would not be warranted by the magnitude of the changes proposed to the building, for several reasons. The DSEIR conclusion was based on the fact that, while significant alterations would be made to the interior of the building, most exterior features would be preserved. In addition, NPS and SHPO review up to that time made no mention of effects on the historic districts. Despite the proposed addition of the mechanical penthouse, the SEIR authors concluded that, overall, the project would not adversely affect the principal distinguishing feature of these National Register historic districts – the composition of Beaux Arts structures centered around City Hall – so as to affect the districts or the old Main Library building’s

¹ The NPS and the SHPO limited their comments on the Draft SEIR to the effects on the National Historic Landmark District, and did not explicitly include any statement concerning the effect of the project on the federally designated Civic Center Historic District, listed on the National Register of Historic Places. Nevertheless, NPS staff has indicated that the project would similarly result in the old Main Library building no longer being contributory to either National Register district (Crowe, 1998).

contributory status therein (see the revised and added text for SEIR p. 59, p. C&R.16, below, which includes an excerpt from the National Register Historic District nomination form).

The nomination form states that the principal issue in the design competition for the 1917 Main Library building was the shape of the building and its relationship to other Civic Center buildings: George Kelham's design was chosen in part because it met the requirement for a building that did not fill the entire block yet managed to help define the principal planning axis of the Civic Center, along Fulton Street between Market Street and City Hall (Corbett, 1974, p. 8-c17).

The SEIR authors did conclude that the project would have a significant effect on historic architectural resources. Effects on the old Main Library building itself as a result of the project, discussed in the SEIR, include the proposed demolition of most of the building interior and the installation of new floor levels in the second floor reading rooms. The reading rooms, along with the other ceremonial spaces (the Main Entrance Hall and Vestibule, the Monumental Staircase and Loggia, and the Great Hall), make up what the National Register nomination form calls "the crowning architectural feature of the library," which is executed with greater embellishment than the building's exterior, in deference to City Hall. Because of the importance of the interior of the old Main Library Building, including those rooms identified as Exceptionally Significant Interior Spaces in Article 10 of the Planning Code, the interior changes proposed by the project were found to result in a significant unavoidable impact. Neither the interior changes nor the relatively less extensive exterior alterations were determined to significantly affect either the historic districts or the building's Contributory status within the districts, owing primarily to the absence of effect on the relationships between the old Main Library and other buildings in the district, and because, while a new roof element would be added, most character-defining features and facades of the building would be retained without major alteration. The commenters, NPS and SHPO themselves, reviewed the project earlier, including the main exterior and interior alterations currently proposed, and concluded in a September 1997 joint letter to the project sponsor that the project would not meet the Secretary of the Interior's *Standards for Rehabilitation*, as noted on SEIR p. 71, but made no mention, at that time, of potential impacts on the historic districts, even though the mechanical penthouse proposed at that time was slightly larger than that described in the SEIR (based on drawings included with the July 25, 1997, Certificate of Appropriateness application).

Notwithstanding the above, the SEIR preparers acknowledge the special role of the SHPO as the state's expert on historic architectural resources and the NPS' expertise in evaluating changes to historic buildings; thus, the comments of these agencies cannot be dismissed. Accordingly, the SEIR is revised, as indicated below, to incorporate their assessment regarding potential effects on the National Register-listed historic districts.

The second full paragraph on p. 59 is replaced with the following:

The project site is located within three historic districts: local, National Register, and National Historic Landmark. Neither exterior nor interior changes

would alter the fundamental relationship between the old Main Library building and City Hall, which, according to their nomination forms and case reports, is the key element unifying each of the three districts. The 1974 nomination form for the National Register historic district – the first prepared for the Civic Center – states:

The criteria on which the buildings are judged, then, must be the degree to which each enhances the group without distracting from the City Hall. These qualities are achieved through a harmony of color, material, scale, size, texture, rhythm, and style. Within these constrictions the buildings achieve individual interest through the imaginative manipulation of the elements. These are the criteria on which the architects of the buildings would have wanted them to be judged (Corbett, 1974; p. 8-c5).

Nevertheless, the National Park Service and the State Historic Preservation Officer believe that effects on the National Register historic district and the National Historic Landmark District would be significant because, in their view, changes to the old Main Library building could result in the building no longer being deemed contributory to the districts.

Regarding effects on the local Civic Center Historic District, Appendix J of Planning Code Article 10 makes the same statement as the National Register nomination form regarding the relationship of other Civic Center buildings to City Hall. The project would not alter this fundamental relationship. The Planning Commission and Board of Supervisors could choose to retain the old Main Library building as Contributory to the local historic district, or could determine that the Appendix J need be revised to designate the old Main Library building as Contributory/Altered, or as Noncontributory. No such action is proposed at this time.

The first full paragraph on SEIR p. 71 is revised as follows (new language is underlined; deleted language is indicated with ~~striketrough~~):

The project would alter the existing exterior facades of the old Main Library building, including installation of a hipped-roof mechanical penthouse and screen; construction of new doors, elimination of some existing windows; creation of an outdoor garden and outdoor dining area; removal of existing statuary and installation of new statuary; changes in windows and/or glazing; and removal of existing brick from the secondary east facade and from the north side of the south wing and the light courts. The EIR preparers believe that these exterior alterations would not substantially affect the historic or architectural significance of the local and national historic districts in which the old Main Library building is considered contributory. This is because the majority of changes to the building would be on its interior, exterior changes would be limited in scope, and, while a new roof element would be added, none of the changes would affect the relationship between the old Main Library building and City Hall, which is the key element unifying the buildings within the local and national historic districts as articulated in the 1974 nomination form for the

National Register historic district. Nonetheless, opponents of the project, including recognized experts such as the State Historic Preservation Officer (SHPO) and the representatives of the National Park Service (NPS), have stated their belief that the interior and exterior alterations proposed would “very severely impact the integrity of the building” and that, as a result, “the building would no longer have the ability to contribute to the significance of the National Historic Landmark District” (Look, 1998). ~~Interior changes would not be expected to affect the building’s contributory status within these districts, or substantially alter the character of the districts. For these reasons, project effects on the historic districts would not be considered significant.~~

Regarding the local Civic Center Historic District, the Planning Commission and Board of Supervisors could choose to retain the old Main Library building as Contributory to the local historic district, or could determine that Appendix J need be revised to designate the old Main Library building as Contributory/Altered, or as Noncontributory.

In addition, the following is added as a new paragraph prior to “References” on SEIR p. 71 [now p. 71a]:

Subsequent review of the project by the National Park Service and the State Office of Historic Preservation, following publication of the DSEIR, resulted in comments that the project would affect the old Main Library building so that the structure would no longer contribute to the Civic Center National Historic Landmark District or the Civic Center Historic District that is listed in the National Register of Historic Places. The Park Service stated that it “would recommend the removal of the building from the list of contributing structures to the historic significance of the district as it would no longer convey the architectural designs of George Kelham” (Look, 1998).

The References section beginning on SEIR p. 71 [now p. 71a] is revised to include the “Look, 1998” reference listed below.

Finally, the first full sentence on SEIR p. 7, in the Summary, is revised as follows (new language is underlined; deleted language is indicated with ~~strikethrough~~):

The EIR preparers believe that project effects on the local and national historic districts would not be considered significant because the majority of changes to the building would be on its interior, exterior changes would be limited in scope, and, while a new roof element would be added, none of the changes would affect the relationship between the old Main Library building and City Hall, which is the key element unifying the buildings within the local and national historic districts. However, according to the National Park Service and the State Historic Preservation Officer, due to the exterior and interior alterations the building would no longer have the ability to contribute to the significance of the National Historic Landmark District ~~would not substantially affect the historic or architectural significance of the districts and interior changes would not be expected to result in the loss of the old Main Library building’s contributory~~

~~status within the federal districts, or substantially alter the character of the districts.~~

Regarding effects on the local Civic Center Historic District, Appendix J of Planning Code Article 10 makes the same statement as the National Register nomination form regarding the relationship of other Civic Center buildings to City Hall. Given that the project would not alter this fundamental relationship, the Planning Commission and Board of Supervisors could choose to retain the old Main Library building as Contributory to the local historic district, or could determine that the Appendix J need be revised to designate the old Main Library building as Contributory/Altered, or as Noncontributory.

In addition, the following is added as a new last sentence of the first partial paragraph on SEIR p. 61, regarding the mechanical penthouse/screen:

According to the State Historic Preservation Officer, it also “would create a false historic appearance, transforming the building from a neo-classical structure based on Italian architectural precedent to a building in the French Baroque style” (Abeyta, 1998).

The References section beginning on SEIR p. 71 [now p. 71a] is revised to include the “Abeyta, 1998” reference listed below.

Importantly, the change in how the effect on the historic districts is characterized, while directly related to physical changes identified and discussed in the SEIR, results not from the SEIR’s omission of any analysis of physical effects, but rather from a different interpretation of the SEIR’s very characterization of those physical effects. No new information of substantial importance is presented herein that would result in a new significant impact or substantially increase the severity of a previously identified impact (i.e., substantial adverse changes to historic architectural resources).

REFERENCES - LETTER A

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Abeyta, Daniel, Deputy State Historic Preservation Officer, State Office of Historic Preservation, California Department of Parks and Recreation, letter of comment on Draft SEIR, August 19, 1998

Crowe, Michael, Historian, National Park Service Pacific West Field Area, telephone communication, September 23, 1998.

Look, David W., Team Leader, Cultural Resources, National Park Service Pacific West Field Area, letter of comment on Draft SEIR, August 18, 1998.

Page & Turnbull, *Historic Structure Report, Old Main Library, San Francisco, California*, August 19, 1998.

Note: The above references (except “Crowe, 1998”) are also added to SEIR p. 72.

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION142986
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August 19, 1998

Ms. Hillary Gitelman
Environmental Review Office
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Subject: Response to Draft Supplemental Environmental Impact Report for Asian Art Museum

Dear Ms. Gitelman:

Thank you for the opportunity to respond to the Supplemental Environmental Impact Report for the proposed Asian Art Museum. The State Office of Historic Preservation is interested in this project because the proposed Asian Art Museum project will extensively alter and remodel both the exterior and interior of the Old Main Library Building. The Library building contributes to the San Francisco Civic Center National Historic Landmark District. In September 1997 the State Office reviewed proposed changes to the Old Main Library and expressed concern that the project would not meet the *Secretary of Interior's Standards for Rehabilitation*.

The State Office of Historic Preservation has broad authority under federal and state law for the implementation of historic preservation programs in the State of California. The SHPO makes determinations of eligibility for listing on the National Register of Historic Places and the California Register of Historical Resources. The State Office is an agency with jurisdiction by law under CEQA (PRC 5024.6(j)).

Project Impacts

The SHPO agrees with the conclusion of the SEIR that the preferred project would result in a substantial adverse change in the significance of the resource and would be a significant, unavoidable impact on the environment. The SHPO, however, does not agree with the SEIR conclusion that the significant impacts to the building would not substantially affect the historic or architectural significance of the Landmark District.

1

2

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The preferred project would introduce a new hipped metal roof penthouse to "screen" the addition of rooftop mechanical systems. Such alteration would not only introduce a large and intrusive visual element at the roofline, it would create a false historic appearance, transforming the building from a neo-classical structure based on Italian architectural precedent to a building in the French Baroque style. Additional exterior alternation include, but are not limited to, removal of the original window glazing; substantial alteration of the Fulton Street façade, and the removal of statuary on the west façade. The SEIR does not discuss or illustrate the potential impact of the insertion of a seismic moat on the front elevation of the building. These changes would severely compromise the historic integrity and appearance of the building. In conjunction with the magnitude of the proposed changes to the significant interior spaces, the project would so substantially alter the historic building as to jeopardize its continued ability to contribute to the National Landmark District.

2
Cont.

The SEIR fails to provide adequate graphic representation, or computer modeled illustrations that would allow decision makers and the public to understand the full visual impact of the proposed exterior changes. Such graphic presentation is a common part of most environmental documents. It also fails to present adequate representation of the very significant interior spaces that will be substantially altered or demolished under the proposal.

3

Alternatives

Alternative B

Although the SEIR fails to identify the environmentally superior alternative, Alternative B, the full Preservation Alternative would meet *the Secretary of the Interior's Standards for Rehabilitation* and would not result in a significant impact. The analysis of feasibility rests primarily on the assertion that Alternative B would result in less gallery space than the present museum located in Golden Gate Park. The SEIR fails to explain why the approximately 65% increase in floor space that would result from a move from Golden Gate Park to the Library building would not result in additional exhibition space. The discussion does not consider additional space that will be provided by the Phase 2 planned expansion of the museum.

4

In support of its contention that the Alternative does not meet programmatic requirements, the SEIR cites only the existence of differing ceiling heights limiting tall exhibits on the 4th floor, lack of "dynamic light filled spaces full of movement," and an existing circulation pattern that would not "relate the path of travel to the origin and spread of Buddhism." The reader is left to intuit how spaces lacking "movement" and

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paths unrelated to "the origin and spread of Buddhism" render the exhibition of art infeasible within existing or alternatively rehabilitated spaces in the Old Library.

4
Cont.

Alternative C

In its present form, Alternative C would appear to result in a significant impact. However, the degree of intervention and alteration is substantially less than under the preferred project. This alternative does not substantially alter many of the significant spaces, including the second floor loggia, the murals, the entrance lobby, the Grand Staircase and Great Hall. Intervention in the reading rooms would be reduced through the use of mezzanines.

With sensitive treatment this alternative could meet the *Secretary of Interior's Standards for Rehabilitation* and lessen impacts below a level of significance.

5

The reasons stated for the rejection of this alternative, as in the case of Alternative B, rest entirely on assertions unsupported by data or facts presented in the record. It is again unclear as to why varying ceiling heights restrict circulation, or, how "paths unrelated to the origin and spread of Buddhism" render the use of the existing space unfeasible for the exhibition of art. The EIR does not adequately explain why the future Hyde street addition with the same building envelope as in the Phase 2 proposed project would "preclude future expansion necessary for long term viability." There is no definition of, or criteria for determining "viability." The EIR cites the unsuitability of the alternative from "funding viewpoints" without explanation, analysis or supporting documentation.

Mitigation

It is unclear in what way the preparation of an Historic Structures Report would mitigate significant impacts of the project. Normally an HSR is prepared early in the planning stages of a project, prior to design development, in order to identify character defining elements, finishes and ornamentation, to establish a hierarchy of architecturally or historically significant spaces within the building, and to document alterations over time. The purposes of this analysis is to identify potential development constraints and guide the design process.

6

In this case significant elements of the building were identified and a hierarchy of spaces was developed by Carey and Co. This analysis is cited in the SEIR, was used to evaluate impacts, and presumably informed design development. It is hard to imagine

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what an HSR would now add to this analysis or how it would be used to lessen impact after the certification of an EIR.

Rather than the preparation of an HSR, full HABS/HAER documentation of the building would appear to be a more appropriate mitigation. Given the level of significance of the building and the fact that the proposed project will virtually gut the interior and significantly altered the exterior, HABS recordation would provide an important, public archival record. The SEIR does indicate that some form of recordation is "under consideration." Meaningful mitigation through recordation should clearly require consultation with the National Park Service, specify standards consistent with HABS, and should, at a minimum, include a full documented history of the building and its context, use of wide format photographs for all exterior elevations and all significant interior spaces, color photography where deemed appropriate, and submittal of all records to the Library of Congress in addition to the local archives identified in the SEIR.

Reconsideration and redesign of the rooftop penthouse to avoid false historicism could reduce impact.

The proposal to provide funds "towards" the Piazzoni mural restoration lacks specificity. There is no documentation in the record to indicate how the \$250,000 figure was arrived at, or what additional funds would be necessary to restore and reinstall the murals in another exhibition space. The mitigation measure also does not address the interim or permanent storage of the murals. The proposed exploration of "options for the relocation and public display" is speculative and does not ensure the preservation of the murals. CEQA requires that mitigation be specific and enforceable. For all the above reason, the proposed mitigation meets neither of these criteria.

The SHPO strongly urges the Planning Commission not to certify the SEIR and to engage in a more thorough and adequate exploration of alternatives. The SHPO believes that with modification, Alternative C could be developed in such a manner that it would meet the *Secretary of Interior's Standards for Rehabilitation*. While the SHPO is appreciative of the need for the museum to acquire additional space for exhibition, public activities and administration and to achieve seismic protection, other goals cited as reasons for the rejection of less environmentally damaging alternatives appear less compelling. Objectives such as "relating the path of travel [within the proposed museum] to the origin and spread of Buddhism," while of educational and symbolic value, must be weighed against the loss of integrity to one of the nation's most significant Beaux Arts civic complexes. Additional consideration and

Hillary Gitelman

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development of alternatives prior to the certification of a final environmental document might lead to a solution that would substantially lessen impacts while still meeting critical program goals.

9
Cont.

The SHPO is hopeful that these comments will aid the Commission in its decision making process. If there are further questions, please call Daniel Abeyta, Deputy SHPO, (916) 653-6624, or contact Carol Roland (916) 653-9514 or Steade Craigo (916) 653-9028 of the State Office staff.

Sincerely,



Daniel Abeyta

Deputy State Historic Preservation Officer

LETTER B – STATE OFFICE OF HISTORIC PRESERVATION

- B-1) The September 1997 review by the SHPO is noted on SEIR p. 71. Comments by the SHPO are gladly accepted, although the SHPO has no authority to approve or disapprove the proposed project, which is solely within the jurisdiction of the City and County of San Francisco.
- B-2) Regarding changes to the roof line of the old Main Library building, please see the response to Comment A-4, p. C&R.14. Concerning the seismic moat that would surround the old Main Library building as part of the base isolation component of the seismic upgrade, this component of the project would not be perceptible to the average observer. As with seismic moats at City Hall and the new Main Library, the moat around the old Main Library building, along with the base isolators, would allow for the building to move horizontally as a unit, independently of the ground, in an earthquake: the moat provides space for this horizontal building motion. Those moats have been incorporated into their old and new buildings without visual intrusion.

At the new Main Library building to the south, the seismic moat is covered by paving panels that appear identical to the remainder of the paving that surrounds the building; only the metal edging between the moat and the other paving indicates the presence of the moat. As is the case with the seismic moat around the new Main Library, where the old Main Library building is surrounded by concrete or stone (Larkin, Fulton, and Hyde Street frontages), the seismic moat would be completely at or below grade and would be covered by panels of concrete, stone or other masonry approximately 3 feet wide; the covers would match the adjoining paving material; on McAllister Street, the moat would be covered by planter boxes at the base of the building and would be obscured by vegetation. At the Larkin and Fulton Street entrances, rebuilt steps would cover the moat. Therefore, most persons would not know the moat was present, and the moat would not substantially alter the exterior appearance of the building.

- B-3) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, a number of figures have been added to the SEIR, depicting visual simulations of the building exterior; “before and after” interior elevations of Rooms 201 and 210, the main second floor reading rooms; interior photographs of Article 10 interior features (Exceptionally Significant Interior Spaces) proposed for alteration; an additional rendering; and interior photosimulations of the main reading rooms converted to two stories of galleries, the second floor loggia with the Piazzoni murals removed, the main stair, and main entry hall. The new figures [presented in Section F of the published Draft Summary of Comments and Responses] have been incorporated within the text of this FSEIR, as indicated in the Table of Contents, or have been included in Appendix A.
- B-4) As stated on SEIR p. 19 under Project Sponsor’s Objectives, the Asian Art Museum seeks not only to increase gallery space, and in particular space for temporary exhibitions, in its adaptive reuse of the old Main Library building, but also to add space for educational activities and space for art storage and art conservation and restoration.

The 65 percent increase in space noted by the commenter describes the net increase in usable program space for the Asian Art Museum at the old Main Library, compared to the museum’s current Golden Gate Park location (SEIR p. 24). This figure is for the proposed project, and

includes the space to be gained on the proposed new third floor in the existing two-story reading rooms, which would provide approximately 40 percent of the proposed gallery space for the museum's permanent collection, as stated on SEIR p. 36 (as revised in this Summary of Comments and Responses; see the response to Comment L-4, p. C&R.104). Neither Alternative B nor Alternative C would provide as much gallery space within the old Main Library building as would the proposed project. According to the project sponsor, Alternatives B and C would provide approximately 33,000 sq. ft. of gallery space in the old Main Library building, compared to about 37,000 sq. ft. with the project (Killoran, 1998a).

Regarding potential future expansion (Phases 2 and 3), as stated on SEIR p. 19 and described further on p. 43, this proposed expansion space would be constructed in the future, subject to availability of funding, and is considered by the museum to be "critical to its long-term operational needs, as the museum's collection is expected to continue to grow." As noted in the description of Alternative C, Reduced Impact on Historic Architectural Resources, that alternative "would construct three additional stories above the lower level extension at 45 Hyde Street, the same building envelope as proposed in Phase 2 of the project" (p. 108), thus "preclud[ing] some of the future expansion space anticipated as Phase 2 of the proposed project" (p. 109). That is, use of the 45 Hyde Street site to satisfy a portion of the current (Phase 1) program requirements of the museum would result in less potential for museum expansion in the future.

Such construction at 45 Hyde Street is not included in Alternative B, but would similarly preclude at least some portion of the potential future expansion if included in that alternative, by consuming more of the site's potential building envelope as part of the base project, than would occur with the museum's preferred project.

Regarding the SEIR's "contention that the Alternative [B] does not meet programmatic requirements," it should be noted that this discussion – for both Alternative B and Alternative C – is in the section titled "Project Sponsor's Reason for Rejection." It is not the function of the SEIR to advocate for or against the proposed project or its alternatives, or to evaluate the sponsor's objectives or rationale. Rather, an EIR is intended to be neutral and disclose potential impacts of a proposed project so that decision-makers can make an informed choice about whether to grant project approval(s).

The sponsor's reasons for rejection of alternatives are presented for informational purposes. At the time the project is proposed for adoption, decision-makers must determine if the proposed alternatives are feasible. This determination will be made based on substantial evidence in the entire record. This evidence would include, but not be limited to, the SEIR, the Main Library/Asian Art Museum FEIR, and the 1996 FEIR Addendum, as well as materials in the Certificate of Appropriateness application and other materials presented by the project sponsor as well as project proponents and opponents to support their various perspectives. That is, the project sponsor (and others) will have the opportunity to present additional, more detailed information to the decision-makers during their consideration of project approval.

To clarify that Alternative B is considered the environmentally superior alternative, the first sentence of the third paragraph on SEIR p. 97 is revised as follows (new language is underlined; deleted language is indicated with ~~striketrough~~):

As explained below, the Full Preservation Alternative would eliminate the significant impact on historical resources, and would be the environmentally superior alternative. ~~while~~ The Reduced Impact Alternative would reduce but not eliminate that impact.

- B-5) Concerning effects of Alternative C, Reduced Impact on Historic Architectural Resources, please see the response to Comment A-2, p. C&R.13.

Regarding the project sponsor's reasons for rejecting Alternative C, please see the last paragraph of the response to Comment B-4, above.

- B-6) At the time the DSEIR was published, in July 1998, the Historic Structure Report (HSR), by Page & Turnbull, preservation architects, was under way but was not complete; available data were cited in the DSEIR's impacts assessment in Section III.A. The HSR was published in August 1998. An earlier historic resources inventory was prepared by Carey & Co., as noted by the commenter and discussed in Chapter III of the SEIR (p. 57 and Table 3, pp. 63-64).

Regarding preparation of documentation to the standards of the Historic American Buildings Survey (HABS), the SEIR includes a mitigation measure, which has not been agreed to by the project sponsor but would be imposed by decision-makers if feasible. That measure would require documentation by a preservation architect of "the important historic architectural features of the old Main Library, including, at a minimum, those features designated in Planning Code Article 10 as Exceptionally Significant Interior Spaces and those features identified in Table 3, p. 63, as Preservation Zone 1 or 2 by the preservation architect" (SEIR p. 86). This measure would partially, but not fully, mitigate the adverse effects of the project on historic architectural resources by adding to the historical record concerning the old Main Library building, and would supplement the large volume of material already available on the old Main Library building, including the Historic Structure Report noted above; the Building Evaluation Report prepared in 1994 (Carey & Co., 1994); the nomination forms for the National Register of Historic Places historic district (Corbett, 1974); the case report for the local Civic Center Historic District (Starrett *et. al.*, 1993); and other materials, including those referenced in the above documents. Other existing documentation includes architectural drawings of the old Main Library building.

To ensure that the documentation required by the mitigation measure on p. 86 is adequate, the following is added prior to the last sentence of that measure:

The format and content of the documentation would be approved by the Environmental Review Officer and the President of the Landmarks Preservation Advisory Board prior to the start of any demolition work.

- B-7) Reconsideration and redesign of the rooftop penthouse could reduce this impact. The SEIR analyzes an alternative without the mechanical penthouse. This alternative is infeasible according to the project sponsor. Alternative B, the Full Preservation Alternative, would not include the hipped-roof mechanical penthouse and screen that is proposed as part of the project.
- B-8) According to the project sponsor, the figure of \$250,000 to be provided by the Asian Art Foundation towards restoration of the Piazzoni murals, cited in the first mitigation measure on SEIR p. 86, is based on an estimate from conservator James Alkons, one of the five art conservators who examined the murals in 1996 and 1997 (see SEIR p. 56). The Alkons proposal includes:

- Complete documentation and photographic records of condition before, during and after conservation treatment;
- Application of an appropriate protective tissue facing with a suitable adhesive mixture;
- Mechanical separation of the paintings from the wall surface with appropriate tools, accompanied by scaffolding and protective support measures taken during treatment;
- Rolling of removed and faced paintings on large diameter support tubes (sonotubes) with appropriate interleaving material and wrapped with protective polyethylene for storage; and
- Further conservation treatment to reattach paintings to a suitable new support system once future disposition is known (Alkons, 1997).

According to the project sponsor, the \$250,000 is an estimated budget for relocation of the murals, and is not a cap on the amount of money available for moving the murals (Killoran, 1998b).

As stated on SEIR p. 95, *removal* of the Piazzoni murals from their original location in the old Main Library building is one reason that the SEIR authors determined the project would have a significant effect on historic architectural resources. Implementation of the mitigation measure to relocate the Piazzoni murals would reduce, but not eliminate, significant project effects on historic architectural resources. Therefore, whether this mitigation measure could be fully and successfully implemented would not affect the SEIR's conclusion that the project would result in a significant, unavoidable effect on historic architectural resources. SEIR Alternatives B and C would retain the murals in place.

- B-9) The commenter's support for Alternative C is noted. As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, Figures 16, 17, 18, and 19, depicting Alternative C, Reduced Impact on Historic Architectural Resources, have been added to the SEIR (pp. 109a-109d), providing additional description of Alternative C. Whether the proposed project or an alternative is ultimately adopted will depend on the decision-makers. As stated on SEIR p. 97, the decision-makers must select an environmentally superior alternative, unless it is found to be infeasible based on substantial evidence in the record.

REFERENCES - LETTER B

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Alkons, James, Northern California Art Conservators, "Examination and Painting Condition Report with Proposed Conservation Treatment." Prepared for the Asian Art Museum. January 15, 1997

Carey & Co., Inc., *Building Evaluation Report, Main Public Library, San Francisco, California*, March 31, 1994.

Corbett, Michael, Nomination form for National Register of Historic Places. December 2, 1974.

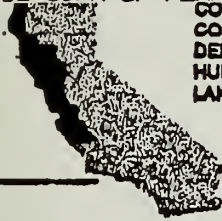
Killoran, Jim, Project Manager, New Asian Project, memorandum to Carol Roos, San Francisco Planning Department, November 20, 1998a.

Killoran, Jim, Project Manager, New Asian Project, memorandum to Carol Roos, San Francisco Planning Department, November 6, 1998b.

Starrett, Patricia, and John Pound, "San Francisco Civic Center Historic District Case Report," Prepared for the Landmarks Preservation Advisory Board; reviewed by Jonathan Malone, (late) Secretary, Landmarks Preservation Advisory Board; reviewed and updated by Vincent Marsh, Secretary, Landmarks Preservation Advisory Board, October 1, 1993.

C. WRITTEN COMMENTS AND RESPONSES

OCT 06 '98 12:39PM SF PLANNING DEPT 4155586426

HISTORICAL
RESOURCES
INFORMATION
SYSTEMCOLUSA
CONTRA COSTA
DEL NORTE
HUMBOLDT
LAKEMARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO
SAN FRANCISCOSAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLOP.2
Northwest Information Center
Sonoma State University
1801 East Cotati Avenue
Rohnert Park, California 94928-3609
Tel: 707.664.2494 • Fax: 707.664.3847
E-mail: nwi@sonoma.edu

July 27, 1998

File No.: 98-SF-54E

Lynne Roos
Regional Coordinator
San Francisco Planning Department
Major Environmental Analysis Team
60 Mission Street, 5th Floor
San Francisco, CA 94103

RECEIVED

JUL 29 1998

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

97.750E - Asian Art Museum.

Dear Ms. Roos:

Records at this office were reviewed to determine if this project could adversely affect historical resources. The review for visible historic structures, however, was limited to references currently in our office. The Office of Historic Preservation determined that any building or structure 45 years or older may be of historic value. Therefore, if the project area contains such properties they should be evaluated by a historian prior to commencement of project activities. Please note use of the term historical resources includes both archaeological sites and historic structures.

☐ The proposed project area contains or is adjacent to the archaeological site(s) (). A study is recommended prior to commencement of project activities.

☒ The proposed project area has the possibility of containing unrecorded archaeological site(s). Consult with an archaeologist regarding development of a project specific plan to be included in the EIR. 1

☐ The proposed project area contains a listed historic structure (). See recommendations in the comments section below.

☐ Study # identified one or more historical resources. The recommendations from this report are attached.

☐ Study # identified no cultural resources. Further study for historical resources is not recommended.

☐ There is a low possibility of historical resources. Further study for historical resources is not recommended.

☒ Comments: Please keep in mind that human remains were found buried 75 feet below the ground surface very close to project area. 1 Cont.

If archaeological resources are encountered during the project, work in the immediate vicinity should be halted until a qualified archaeologist has evaluated the situation. If you have any questions please give us a call (707) 664-2494.

Sincerely

Lynn Compas, MA for
Lyle Jordan
Coordinator

LETTER C - CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM

- C-1) The comment is noted. The 1992 Main Library/Asian Art Museum FEIR identified the potential for the discovery of subsurface cultural resources and included a mitigation measure. Artifacts from the 19th century City Hall on the project site, as well as remains associated with the former Yerba Buena Cemetery, were recovered and/or documented pursuant to this measure prior to construction of the new Main Library.

Such a mitigation measure is included in the SEIR (p. 87); it would, among other things, require an archaeologist be present during site excavation.



FAXED DOCUMENT

NO. OF PAGES: 1

Faxed to: 415/558-6409

UNIVERSITY OF CALIFORNIA
HASTINGS COLLEGE OF THE LAW

THOMAS SIMMS
Director of Administrative Services

August 20, 1998

The Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103

Re: Asian Art Museum
Draft Supplemental Environmental Impact Report

Dear Sir or Madam:

The development of the Asian Art Museum on the site of the old Main Library is an exciting element of the overall rejuvenation of the Civic Center. The addition of a world-class museum will represent a major improvement greatly enhancing the area.

The design is very impressive particularly the melding of new architectural elements into a building shell that is substantially preserved. However, with two of the College's buildings adjacent to the site, it is not readily apparent whether the visual impact of the loading dock, and more specifically, the emergency generator on the corner of Hyde and McAllister, is to be mitigated by a facade, wall or screen.

The loading area and emergency generator (Figure 6, Proposed Ground Floor Plan) are adjacent to two of the College's facilities (198 and 200 McAllister Street). While the plans indicate that a new fence is to be installed around this area (Figure 4, Proposed McAllister Street Elevation) it is unclear whether the fence will 'hide' the loading dock and emergency generator. While we understand the necessity of a loading dock and utility area, we request that every effort be made to minimize any adverse visual impact when this portion of the site is viewed from Hyde or McAllister Streets.

Thank you for the opportunity to comment on the plans. Please do not hesitate to contact me if you require any clarification or further information.

Sincerely,

David Seward
Chief Financial Officer

DS:da

cc: Dean Mary Kay Kane

200 McALLISTER STREET • SAN FRANCISCO, CALIFORNIA 94102-4978

Internet: simms@uchastings.edu • (415) 565-4806 • FAX (415) 563-4884

PLG 22 98 02:18PM U C HASTINGS COLLEGE OF LAW

LETTER D – HASTINGS COLLEGE OF THE LAW

- D-1) Since publication of the DSEIR, the project sponsor has altered the exterior plans for the project site's northeast corner and now proposes a masonry wall around the emergency generator and loading dock. As seen in revised Figure 5, SEIR p. 33, only the exhaust vents of the emergency generator would be visible above the wall, and the lower level loading dock would be screened from view from the north.

余胤良博士



Leland Y. Yee, Ph.D.
San Francisco Board of Supervisors

三藩市市參事



July 20, 1998

Landmarks Preservation Advisory Board
1660 Mission St., 5th Flr.
San Francisco, CA 94102

Re: Support for Asian Art Museum Draft Supplemental EIR

I am writing to support the passage of the Asian Art Museum's Draft Supplemental EIR by the Landmarks Preservation Advisory Board. As one in every three San Franciscans is of Asian Ancestry, we desperately need an Asian Art Museum that is reflective of our City's diversity. Currently, 85% of the Asian Art Museum's collection sits in storage. The longer it takes to complete the new Asian Art Museum the longer the world cannot appreciate the rich Asian culture while in one of America's most diverse cities.

Further, the people of San Francisco have spoken in passing the Asian American Art Museum bond measure. Accordingly, it is our responsibility as a government to follow the will of the people and erect the museum in a timely and purposeful manner.

Approval of the Draft EIR will dramatically help in moving this matter forward. The Asian Art Museum is a very important project to the Asian community as its completion is a testament to the position of the Asian American in contemporary society. This world's class cultural and educational facility will showcase an often unnoticed but vital part of modern American society. For these reasons, I urge you to approve the draft EIR for the Asian Art Museum.

Thank you for your attention to this matter.

Sincerely,

Leland Y. Yee, Ph.D.
Member
Board of Supervisors

LYY:jl

1

LETTER E – SUPERVISOR LELAND YEE

- E-1) The commenter's letter of support for the proposed project is noted. As part of these Comments and Responses, it will be forwarded to the decision-makers for their consideration. The letter is not a comment on the DSEIR requiring a response.



LANDMARKS PRESERVATION ADVISORY BOARD

1660 MISSION STREET, 5TH FLOOR, SAN FRANCISCO, CA 94103-2414

TEL. (415) 558-6345 • FAX. (415) 558-6409

F

August 17, 1998

Ms. Hillary E. Gitelman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Fifth Floor
San Francisco, CA 94103

RE: **File No. 97.750E**
Comments on Draft Supplemental Environmental Impact
Report for the Asian Art Museum Project

Dear Ms. Gitelman:

These comments on the Draft Supplemental Environmental Impact Report for the Asian Art Museum Project are presented on behalf of the San Francisco Landmarks Preservation Advisory Board. We appreciate this opportunity to review and comment on this document for a proposed adaptive reuse of the old Main Library Building and its expansion into the currently vacant area along Hyde Street between McAllister and Fulton Streets. The Project site is a significant element of the Civic Center Historic District, and the Supplemental Environmental Impact Report is an important component of analyzing the impacts of alternative scenarios for the future use of the site.

The Draft SEIR was considered by the Landmarks Board at a public hearing on August 5, 1998. We received many written communications and heard public testimony which included advice to the Landmarks Board on comments the Landmarks Board might make on the Draft SEIR. Some of the comments were directed more to the merits of the proposed Project than to the adequacy, accuracy or completeness of the Draft SEIR, and we are postponing our consideration of the proposed modifications of the old Main Library building and new construction at this contributory site in the Civic Center Historic District until the Project itself is before us for consideration of a Certificate of Appropriateness.

This letter is intended to be an organized summary of comments on the Draft SEIR made by the Landmarks Board after the close of the public portion of the hearing on August 5, 1998. The hearing lasted over two and a half hours, so this letter represents my best judgment, with the assistance of Landmarks Commissioner

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 2

Jeremy Kotas, in stating the principal points raised at the Hearing by the Landmarks Commissioners and on which the Landmarks Board indicated substantial agreement. The tape of the hearing is also available to your office and to other decision-makers as a record of comments made on the Draft SEIR.

A. PROJECT DESCRIPTION (Ch. 2 pp. 19-49).

The Landmarks Board believes that the following information and documentation should be added to this part of the SEIR in order that the public may more easily understand the proposed project and then more accurately assess its potential environmental impacts:

1. More Information on Exterior Details. The SEIR should have more information in both narrative and graphic form describing the following:

- + The materials, including color, of the screening and penthouse features included within the mansard roof;
- + The "stucco-like" material proposed for exterior wall surfaces on the Hyde Street face;
- + The condition of the statues above the Larkin Street entrance;
- + The dining terrace proposed along the Fulton Street Mall;
- + The Chinese Garden and outside sculpture placements; and
- + The appearance of the "moat" installed as part of the seismic program.

2. More Information on the Civic Center Setting.

- + The description of the San Francisco Civic Center in the Setting sub-section here should include an explanation of its National Register District status, a review of the distinguished history of the monumental

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 3

buildings and the Civic Center Plaza and their respective architects and planners, and an expansion of the cultural and social values represented in the Civic Center District.

- + There should be a discussion on the Beaux Arts building styles and the planning approaches taken in approving new buildings and restorations of older buildings in the Civic Center District over the years.
- + The authors may want to consider relocating or restating into this Chapter part of the text now on pp. 50-53 in the Impacts Chapter.
- + There should also be photos showing the visual relationship to the New Main Library building of both the existing old Main Library building and of the old Main with the proposed rooftop additions using a montage.
- + Finally, there should be clarification whether or not the New Library building was required to match the Old Library building in terms of building height.

3
Cont.

3. Elevations and Cross-Sections of Changed Interior Spaces. This section of the SEIR should contain elevations and cross-section drawings of the proposed changes within the interior spaces. This would include elevations and cross-sections showing the proposed new third floor in the reading rooms, with the resultant distances between the floors and ceiling heights.

4. More Photographs of Interior Spaces and Features. In order to more accurately present the project, the SEIR should have more photographs included, especially of the historically and artistic significant interior spaces or features proposed for demolition or change. In addition, this document would benefit from the addition of copies of artists' renditions of the principal places in the proposed project if constructed according to the project sponsor's plans. There are several obvious ones in the binders filed with the Certificate of Appropriateness application.

4

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 4

5. Narrative Description of Materials in Interior Spaces. There should be more identification and description of the inscriptions on surfaces within the building and a clear statement of which will be retained and which, if any, will be removed through demolition or other alteration. Also, there should be a more complete narrative description of the materials and colors on the walls and doors, and what old materials will be retained and what new materials will be added. Also, if any surfaces in the key interior spaces will be retained but changed in color, that should be clarified.

6. More Information on Piazzoni Murals. The SEIR should have more information in narrative and photographic form about the Piazzoni Murals, including the following:

- + More information on the artist and his importance and recognition received in the Art World;
- + Photographs of the Murals in their setting;
- + Narrative describing the content of each of the Murals, the cycles portrayed, and the significance of the views from the Mountains to the Pacific;
- + Explanation of the significance of the Murals being painted on cotton instead of linen and how this circumstance affects the proposed removal; and
- + More information on their current condition and the condition of the walls on which they are located.

7. More Information on DuMond Murals. The SEIR should have more information in narrative and photographic form about the DuMond Murals, including the following:

- + More information on the artist and his status in the Art World;
- + Photographs of the Murals in their setting;
- + Narrative describing the content of each of the

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 5

Murals; and

+ More information on their current condition.

7
Cont.

8. More Explanation of the Addition of Light into Spaces. The SEIR needs more explanation of the project sponsor's objective of transforming dark, static areas into dynamic, light filled spaces (p. 21) and how that fits with the nature of many historic temples, castles and caves in Asia which were relatively dark places but where much of the art was kept or displayed. Also, much of the historic art of Asia may have developed in conditions with less ambient light than proposed for this project.

8

Straightforward and Comprehensive Project Description. Even with the above-listed items which the Landmarks Board requests to be added to the SEIR, the Landmarks Board found this Chapter on the Project Description to be straightforward and otherwise comprehensive. Several members noted that their site visits and briefing on the proposed project did not show or contain anything not disclosed in the SEIR. Several times it was acknowledged that the text of the SEIR is supplemented by other documents included by reference, including the prior EIR, the Project Description by Gae Aulenti, and Dr. Emily Sano's previous presentation to the Landmarks Board on the project sponsor's objectives for the new Asian Art Museum. Several Board Members commented on the frank nature of Table 2 on p. 27 and Table 3 on p. 63 which showed in condensed but clear fashion that nearly all the interior spaces and features would be demolished to fully accomplish the proposed project.

9

B. ENVIRONMENTAL IMPACTS ON HISTORIC RESOURCES

1. Impacts of Seismic Upgrade (Pages 59-60).

a. The SEIR should explain more fully the probable effect of the seismic upgrading on the Piazzoni Murals if they were encased for safety and kept in place. There should be clarification if the loggia walls on which these Murals are placed are in fact separate from the exterior walls of the light courts and could remain unaffected while the exterior walls receive seismic strengthening.

10

b. The SEIR should more clearly analyze whether

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 6

or not the seismic upgrade programs would require the removal of the Piazzoni Murals.

c. The SEIR should address in this section the comment on p. 22 of the Page & Turnbull Report incorporated as an appendix in the SEIR that the project's seismic program is not yet finalized and that its effects on historic resources cannot be determined at this time so that the SEIR's content is consistent.

d. The SEIR should more closely analyze whether the moat to be installed as part of the seismic program will have any adverse effects on the Civic Center Historic District, such as aesthetic incompatibility.

2. Impacts of Exterior Changes (Pages 60-62)

a. Mansard Roof. The SEIR should analyze the appearance of the proposed mansard roof in relation to new Main Library building, utilizing photographs and mock-ups of the revised roofline.

b. Synthetic Stucco Finish. The SEIR should expand on the comment on p. 62 that the new single story facade on Hyde Street covered with synthetic stucco would not be compatible with the old Main Library in terms of materials or the blank face it would present to the street, clarifying whether the impact is adverse and how significant. Further, the SEIR should analyze the impacts of this feature on the Civic Center Historic District.

c. White Glass. The SEIR should analyze the impacts of the use of "white glass" windows, which could affect the exterior appearance of the altered building on the Civic Center Historic District.

d. Exterior Statues. The condition of the statues on exterior above the Larkin Street entrance should be described and analyzed more fully, including explaining why they cannot be repaired in place, repaired off-site and then returned, or simply stabilized and allowed to remain in place.

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 7

e. Outdoor Dining Terrace. The SEIR should address whether the proposed outdoor dining terrace and related altered door openings in the building would be a positive addition to the Fulton Street mall and to the Civic Center Historic District.

17
Cont.

3. Impacts of Interior Changes (Pages 62-69).

a. New Third Floor. The SEIR should analyze the effects of the proposed new third floor in the large reading rooms, which are rated as Very Significant historic architectural spaces. Does the division of the vertical space, combined with the break-up of the resulting horizontal planes into partitioned spaces as display rooms, obliterate the view values of the large rooms? Will persons standing under the structure of the new third floor or on top of it experience feelings of a low ceiling pushing down on them as distinct from feelings of spaciousness as is the case in the existing reading rooms?

18

b. Loss of Trim or Inscriptions. The SEIR should more clearly identify and analyze the amount of individual and cumulative losses of enriched materials, such as trim or inscriptions, on the walls and ceilings of rooms planned to be demolished.

19

c. Loss of the Piazzoni Murals. The SEIR should more clearly state the severity of the adverse impacts of removing the Piazzoni Murals from their current site in terms of loss of Very Significant historic and artistic resources which contributed so positively to the building when used as the Main Library, as well as the loss of original meaning to the Murals themselves if relocated off-site. The analysis on pages 66-68 gets lost in comments about the division of opinions of conservators about the risk of damage if removed and does not really address the issue of loss of the resource to the building.

20

d. Risk of Damage to Piazzoni Murals. The analysis of risk of damage to the Piazzoni Murals if removed should take into account the additional information recommended above in our comment A.6. and also more analysis of the nature of the walls of which they are placed and whether the seismic upgrade of the outer walls can be conducted without affecting the interior walls on which the Murals evidently are placed. Also,

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 8

the analysis should quantify the anticipated percentage of damage to the Murals and prospects for successful repair or restoration if damaged in removal.

e. Project Sponsor's Reasons for Removing the Piazzoni Murals. The Project Sponsor's reasons for choosing not to reinstall the murals quoted on p. 68 does not clearly explain why the Murals in place cannot be the backdrop for displays of small sculptures and the Museum's collection of jade.

4. Expansion Space (Pages 69-70).

a. Exterior Surfaces. Anticipating that the future addition at 45 Hyde Street could be finished in gray granite or precast concrete panels similar in color and texture to the old Main Library and most of the other monumental structures in Civil Center, why is a synthetic stucco proposed as a building surface of the existing wings of the building facing Hyde Street?

b. Serial Certificates of Appropriateness. The Landmarks Board agrees that a series of Certificates of Appropriateness would be appropriate for later phases of the project when they are eventually designed.

5. Conclusions on Impacts on Historic Resources (Pages 70-71).

a. More factual data, additional comparisons of before and after views, and more analysis is needed in the SEIR to justify the conclusions stated on page 71 (and also p. 59) that the proposed exterior changes will not have significant impacts on the Civic Center Historic District.

b. The determinations by the National Park Service and the State Office of Historic Preservation that the proposed changes would not meet the Secretary of the Interior's *Standards for Rehabilitation* are important documents that should be included in the SEIR as an Exhibit or Appendix item so that readers and decision makers can examine these determinations by agencies with extensive experience in preservation matters and weigh their specific issues of concern.

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 9

C. ENVIRONMENTAL IMPACTS ON URBAN DESIGN (Pages 73-74)

1. The SEIR should contain more analysis of the mechanical penthouse with the appearance of a hipped roof to support the conclusion on p. 74 that the form of the penthouse addition would be generally consistent with the scale and massing of the other Civic Center buildings. 24

2. The SEIR should analyze whether the proposed new third floors in the reading rooms located so close to the exterior walls will be visible to the exterior through the monumental windows on McAllister and Fulton Streets in the dark of night when the interior spaces are lit, and whether such appearance would be an adverse visual impact on the Civic Center Historic District. 25

D. MITIGATION MEASURES PROPOSED TO MINIMIZE POTENTIAL SIGNIFICANT IMPACTS ON HISTORIC ARCHITECTURAL RESOURCES (Chapter IV, Pages 84-86)

1. Bullet number 5 on page 85 should be strengthened to require that all materials identified as historically or architecturally significant actually be salvaged if feasible, and that the amount of salvage be monitored through the Mitigation Monitoring Plan to be adopted for the project as required under CEQA. Related to this, the project sponsor could be required as a condition of a Certificate of Appropriateness to report back to the Landmarks Board and to the Planning Commission on what materials were in fact salvaged and where they ended up.

2. The SEIR should add as a mitigation measure that all materials identified as historically or architecturally significant which are demolished in place or removed from the site should be photographed and inventoried. 26

3. The SEIR should add as a mitigation measure that all replacement or repointing of exterior stone work and cleaning and repairs of the exterior walls, windows, and other features should be supervised by a preservation architect and be conducted in accordance with the Secretary of the Interior's *Standards for Rehabilitation*.

4. The SEIR should add as a mitigation measure that if feasible, the exterior statues should be repaired in place rather

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 10

than replaced per the Secretary of the Interior's Standard No. 6.

5. The SEIR should add as a mitigation measure that if some elements of the total project are not yet fully designed, then a series of Certificates of Appropriateness would be needed, and that a respective Certificate of Appropriateness would cover only those elements of the project which are fully designed at that point in time.

E. ALTERNATIVES (Chapter VI, Pages 97-109)

1. The Landmarks Board agrees with the introductory comment on page 97 that the alternatives represent a reasonable range of alternatives that "brackets potential impacts." Our understanding is that individual elements can be moved around or added to or deleted from a particular alternative.

2. With respect to the "No Project" Alternative on page 98, the SEIR could be expanded by taking the opportunity to explain why a new Asian Art Museum at this location is better than doing nothing with the building. The project would avoid the adverse impact of "demolition by neglect" if the building should stand empty and in a deteriorating condition, which would be a growing negative for the Civic Center Historic District. Also, with the "No Project" alternative, the positive synergy of having the new Asian Art Museum in the Civic Center near the new Library and the performing centers, such as the S.F. Ballet building, the Davies Symphony Hall, and the San Francisco Opera House will promote shared educational and performance art opportunities. When the rehabilitation projects of City Hall and of other monumental buildings around Civic Center are completed and a new Civic Center Plaza is achieved, the Civic Center will become the "living room" of San Francisco as well as a magnet for visitors, and a new Asian Art Museum at this location would be a positive contribution to the City which would be lost under the "No Project" Alternative.

3. While Alternative B (the Full Preservation Alternative) has illustrative floor plans on pages 102-105 which are useful to the reader in understanding how the existing building could be reused as a museum, there are none shown for Alternative C (the Partial Preservation Alternative). The SEIR should be revised to include Figures with floor plans, elevations and cross-section drawings illustrating Alternative C, and the circulation system for museum visitors should be illustrated on the Floor Plans.

Comments on Draft SEIR for Asian Art Museum Project
August 17, 1998
Page 11

4. In Alternative C, the term "true mezzanine" for a revised floor addition in the reading rooms should be defined, and the structure should be described and illustrated.

30

5. The statement of the Project Sponsor's reasons for rejection of Alternative C on page 109 should be clarified to explain in more detail why Alternative C would not allow the path of travel through the museum to be related to the origin and spread of Buddhism; perhaps that could be illustrated graphically on the requested illustrative floor plans. Also, there should be more analysis of how much of the planned gallery space and other functional spaces for the desired program for the new Asian Art Museum would be lost under Alternative C compared to the proposed project plan.

31

6. If not included as a mitigation, a sub-alternative could consider requiring the blank walls proposed for the Hyde Street facing portions of the project be covered in gray granite or precast concrete panels similar in color and texture to the other sides of the old Main Library building and similar to the stone surface treatments on the rear side of most of the other monumental structures in the Civil Center Historic District.

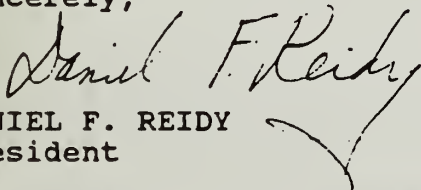
32

Conclusion

While this letter contains quite a few recommendations for additions to the Draft SEIR, overall we are positively impressed with the draft SEIR which attempted to tackle a complex project involving many subtle and complicated issues in a condensed and objective way. In our view, if the SEIR is expanded to include the data and analysis which we have recommended, the SEIR will be a helpful tool to the Landmarks Board, the Planning Commission, and the Board of Supervisors in making decisions on the project itself. We are convinced that it will also assist other involved City and County commissions, such as the Asian Art Commission and the San Francisco Arts Commission, in making appropriate decisions about components of the ultimate project.

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Sincerely,



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President

cc: James Halloran, Project Manager, the Asian Art Museum Project

LETTER F – LANDMARKS PRESERVATION ADVISORY BOARD

- F-1) The comment is acknowledged. It provides a summary of the DSEIR comment hearing at the Landmarks Preservation Advisory Board.
- F-2) In general, many of the comments in this letter request a level of detail beyond what CEQA requires. Section 15124 of the State CEQA Guidelines states that the project description “should not supply excessive detail beyond that needed for evaluation and review of the environmental impact.” Section 15124 prescribes the information to be included in the Project Description. Chapter II, Project Description, of the SEIR contains all required items, including “the precise location and boundaries of the proposed project,” a “statement of the objectives sought by the proposed project,” a “*general* description of the project’s technical, economic, and environmental characteristics (emphasis added),” and a statement briefly describing the intended uses of the EIR, including a list of the required approvals and approving agencies. The SEIR provides information about the project in excess of these requirements.

Much of the information requested by the commenter is appropriate to the project’s application for a Certificate of Appropriateness. As stated on SEIR p. 44, “The City Planning Commission, with advice of the Landmarks Preservation Advisory Board, must approve a Certificate of Appropriateness for exterior and interior alterations to the old Main Library building.” For the reader’s information, the Landmarks Preservation Advisory Board (LPAB) on September 2, 1998, voted to recommend disapproval of a Certificate of Appropriateness for the proposed project.² In acting on the request for a Certificate of Appropriateness, the LPAB considered a number of sources of information, including a separate application filed by the project sponsor, for which a supplement was also submitted, containing detailed project information. The Certificate of Appropriateness application is available for public review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, File No. 97.750A.

The Planning Commission may follow the LPAB recommendation and deny the Certificate of Appropriateness, or may approve the Certificate of Appropriateness, based on the criteria in Planning Code Article 10. As stated on SEIR p. 51, “The standards for review of Certificates of Appropriateness are contained in Section 1006.7 (generally) and in Article 10, Appendix J, Section 9 (specific provisions for the Civic Center Historic District) of the Planning Code.”

Notwithstanding that the comments request information beyond that which is required, or necessary, in an EIR, the following responses provide additional information for the reader’s benefit. Much of the additional information is taken from the Asian Art Museum’s application for a Certificate of Appropriateness.

Project Description: The SEIR adequately and accurately describes the proposed elements noted by the commenter, at a level that is sufficient to determine the significance, under CEQA,

² The Landmarks Board is permitted to make a recommendation to the Planning Commission on the basis of the Draft SEIR (and, if applicable, other material in the record) because it is an advisory body (CEQA Guidelines Sec. 15025(c)).

of the proposed alterations. The following additional material is provided for the reader's information.

The **mechanical penthouse** / screen would be constructed of zinc panels in a medium silver/gray color.

The SEIR states that a "**stucco-like finish**" would replace the existing brick on the walls of the existing light courts, where those walls would remain exterior walls, and on the eastern elevation (p. 28), and that the 12-foot-tall extension of the old Main Library building onto a portion of the 45 Hyde site would be finished with blank panels of synthetic stucco (p. 62). Regarding the extension of the building's lower level, the project sponsor has indicated that, assuming the future expansion phase(s) are constructed at the 45 Hyde Street site, the lower level extension would be re clad at that time with the same masonry to be used on the expansion component(s) (Otsea, 1998).

The **statues** above the Larkin Street entrance of the old Main Library building, including their physical condition, are described in the SEIR on p. 54, in the Setting portion of the section on Historic Architectural Resources. As stated there, "The statues are hollow cast concrete with interior armatures of iron reinforcing bar and chicken wire. They have experienced degradation from exposure to weather, and much of the surface detail has been worn away. The statues show evidence of past minor repairs. One of the statues (figure two, from left to right when facing the building) has sustained cracking and appears to be structurally unsound. Figure one is in the best condition; figure four has suffered some structural damage but retains considerable surface detail, and figures three and five have some minor cracks and retain less detail than figure four." The information on the statues is taken from an evaluation performed in 1996 (Wharton, 1996). It should be noted, however, that the Art Commission has been unable to locate original photographs of the Lentelli sculptures to ascertain the precise nature of the original composition (Lehane, 1998).

The **dining terrace** proposed on the exterior of the Fulton Street elevation (described throughout the SEIR; see particularly p. 29, and Figure 6, SEIR p. 37) would occupy the eastern portion of the concrete plinth, or base, on which the building sits, between the existing Fulton Street entrance stairs and the proposed Chinese Garden towards Hyde Street. The plinth is now filled with dirt and planted with sycamore trees and remnants of a lawn that once covered the plinth. To create the dining terrace, the trees and grass would be removed and a concrete or masonry terrace laid on the dirt. A low stone wall would be constructed around the terrace to provide an edge. Tables and chairs would be placed on the terrace for outdoor dining.

The current design for the **Chinese garden**, at the east end of the old Main Library's south (Fulton Street) wing, includes a granite wall surrounding the garden. (This is a revision from the DSEIR, which depicted a metal fence surrounding the garden; DSEIR Figures 3, 4, and 5 are revised to show the newly proposed stone wall.) Therefore, the garden would not be a feature that would be visible from the building exterior. It would be located atop the concrete plinth, or

base, on which the building sits. At this east end of the south wing, the plinth is about 8 feet tall. The garden would be accessible from the lounge for museum donors and members. Figure 6, SEIR p. 37, and revised Figures 3, 4, and 5, SEIR pp. 31, 32, and 33, show the location of the garden in plan view and elevation. The design of the garden is being developed.

The project also would include the potential for placement of **sculpture** in the existing grass-covered areas in front of the building's Larkin Street facade, as stated on SEIR p. 29. No sculpture has been selected for these locations, immediately north and south of the Larkin Street stairs, and the Museum is not certain that such a program would be implemented. It is possible that such display, if it occurred, would be part of temporary exhibition(s) in the future; that is, the sculpture might not be permanently installed, but rather could rotate as part of the museum's ongoing program of exhibitions. In any case, the sculpture would not be attached to the structure, and would not directly affect the old Main Library building.

Regarding the **seismic moat**, please see the response to Comment B-2, p. C&R.24.

- F-3) Regarding the San Francisco Civic Center, as stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, this is a Supplemental EIR that supplements information included in the Final EIR for the San Francisco Main Library, and summarizes and incorporates by reference portions of that Final EIR, including descriptive material about the Civic Center. The Main Library/Asian Art Museum FEIR devotes 16 pages to description of the Historic Architectural Setting. Pages 54-56 of the Main Library FEIR specifically describe Civic Center and the National Register historic districts, and the 1996 Addendum to that FEIR discusses adoption of the local district. (The Main Library/Asian Art Museum FEIR Summary of Comments and Responses chapter also describes the districts; see pp. C&R.63 - C&R.66.) As stated on p. 54 of the Main Library/Asian Art Museum FEIR and on SEIR p. 51, the Civic Center is notable as a group of primarily public buildings that makes up what is considered one of the nation's largest and finest collections of buildings in the style of the Beaux Arts-inspired City Beautiful movement – considered by many scholars as the nation's finest and most complete collection of such buildings. The SEIR summarizes and incorporates by reference the information in the Main Library/Asian Art Museum FEIR (SEIR p. 50). Rather than repeat that information, the SEIR focuses on the project design as it has developed since publication of the Main Library/Asian Art Museum FEIR, and its impacts. The Main Library/Asian Art Museum FEIR and the 1996 FEIR Addendum are available for review in the Planning Department files, and at libraries and will be before the decision-makers for their consideration at the time of project approval actions.

(Please see also the response to Comment S-1, p. C&R.127, which provides additional information specifically about certain architects involved in the creation of the San Francisco Civic Center.) The text on SEIR pp. 50-53 is already part of the environmental setting under Historic Architectural Resources, to provide the reader with a context for the subsequent impacts discussion.

Regarding other Civic Center buildings, it should be noted that recent and continuing seismic upgrades for City Hall, the Bill Graham Civic Auditorium, the Opera House, and the California State Building have all been conducted on buildings that were to continue in the same use as prior to the renovation. Other work in the Civic Center has involved construction of new buildings: the new Main Library, the Civic Center Courthouse, and the State Office Building, which is nearing completion. The proposed Asian Art Museum project is distinguished from these other projects in that it is the only one that would involve adaptive reuse of a major Civic Center building for a completely new use. (Note that the Civic Center Courthouse and State Office Building were the subject of separate EIRs, and a Negative Declaration was prepared for the seismic upgrade of City Hall.)

Whether or not the new Main Library was required to match the parapet height of the old Main Library building, it is clear that the design intent of the new library was to complement the old library. Although there may be some disagreement about the degree of success achieved, the new Main Library architects stated at the time that their intent was to design facades facing the Civic Center (the Larkin and Fulton Street facades) that would be similar in design to, and use the same or similar exterior stone cladding as, the old Main Library building. As both the old Main Library building and the new Main Library are within the same 80-X height and bulk district, the new library could not have been substantially taller than the old Main Library building without rezoning to increase the allowable height. Like the proposed Asian Art Museum project, the new Main Library also includes features taller than 80 feet, which are allowable exceptions to the height limit, although these features are set back farther from the facades than the museum's proposed hipped-roof mechanical penthouse and screen would be.

As noted on SEIR pp. 60-61, the penthouse and screen would be taller, wider, and closer to the Larkin Street facade than the existing mechanical equipment screen. Although exempt from the Planning Code height limit as a mechanical appurtenance (p. 34), the penthouse and screen would be noticeable, would effectively increase the height of the old Main Library building, particularly in views from Larkin and Fulton Streets, and would increase shadow on Civic Center Plaza, as stated on pp. 74-76. (Please see new Figure 10D, SEIR p. 60b, which depicts the old Main Library building, including the proposed penthouse and screen, adjacent to the new Main Library.)

- F-4) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, a number of figures have been added to the SEIR, depicting "before and after" interior elevations of Rooms 201 and 210, the main second floor reading rooms; interior photographs of Article 10 interior features proposed for alteration (Exceptionally Significant Interior Spaces); an additional rendering; and interior photosimulations.
- F-5) According to the project sponsor, there are no plans to remove any inscriptions from the interior of the building (Killoran, 1998b). (As noted in the SEIR, the inscription over the Larkin Street entrance identifying and dedicating the building has already been covered with an inscription identifying the building as the Asian Art Museum and Chong-Moon Lee Center for Asian Art

and Culture.) Most of the interior inscriptions are located in the second floor Stair Loggia (Room 290); these would remain. Other interior inscriptions, including one in the Entrance Vestibule (Room 191) describing funding for the building and for branch libraries provided by Andrew Carnegie, and those above the doorways in the Great Hall (Room 200), would also remain, as would those above the elevators in the loggia.

Many individual components of interior spaces would be retained and repaired, as required, in certain rooms that would be retained, such as the Main Entrance Lobby and Vestibule (Rooms 101 and 191) and the Great Hall. In other interior spaces, such as the two Main Reading Rooms (201 and 210), most interior finishes would be removed completely and not reused, except the decorated ceiling. All finishes would be removed and not reused in rooms to be demolished. Further detail regarding the proposals for treatment of interior materials may be found in Volume I of the Historic Structure Report (Page & Turnbull, 1998).

- F-6) Regarding the Piazzoni murals, the Main Library/Asian Art Museum FEIR (pp. 61-62, updated in the SEIR, and especially Main Library/Asian Art Museum FEIR pp. C&R.76-C&R.77 and pp. C&R.98-C&R.107) addresses the Piazzoni murals. The following additional information (O'Connor, 1996; Hughes, 1989; Westphal, 1986; SFAC, undated) is provided for the reader's interest.

A biography of Gottardo Piazzoni and a description of the library murals are presented in the SEIR on pp. 55-56. The following is provided for informational purposes. Piazzoni (1872-1945) was born in Intragna, in the canton of Ticino, within the Italian part of Switzerland. He came to California as a teenager to work on his father's dairy farm in the Carmel Valley. As noted on SEIR p. 55, after spending four years assisting his father on the ranch, Piazzoni in 1891 enrolled in the California School of Design in San Francisco, where he studied under Raymond Yelland and Arthur Mathews. As noted in the SEIR, Piazzoni continued his studies in Paris at the École des Beaux Arts and the Académie Julian. When Piazzoni's mother and brother, Massimo, both died in 1897, Gottardo returned to the California ranch, but soon encouraged his father to retire and return to Switzerland with two younger siblings, who had been born in California. Piazzoni accompanied the family home and then visited Paris returning to San Francisco in 1901 to teach. That year, he established two studios in San Francisco: one at 609 Sacramento Street, and another on Montgomery Street that he shared with the sculptor Arthur Putnam. Piazzoni established a residence in Belvedere.

In 1904, Piazzoni exhibited works at the Mark Hopkins Institute, the Bohemian Club, and at the Louisiana Purchase Exposition in St. Louis. The next year saw his first major one-man show, at the Mechanics' Institute Pavilion on Market Street. Piazzoni married in 1905, and the next year traveled to Europe with Arthur Mathews and their two wives. Piazzoni exhibited in Rome in 1906 and Paris in 1907 before returning to San Francisco. He continued to teach, both at his studio and at the California School of Fine Arts, and worked at various locations in San Francisco, also making trips around California. Piazzoni worked both as a painter and muralist, receiving commissions for murals in San Francisco buildings. During this period, his work was well-received, and he won particular praise for his use of light. Piazzoni exhibited

paintings and etchings at the 1915 Panama-Pacific International Exposition. In a 1925 article on three California painters (the others being Maynard Dixon and Armin Hansen), *The American Magazine of Art* noted of Piazzoni's work: "That which seems utter simplicity becomes with study an interesting complexity. The canvases grow upon the vision with peculiar subtlety. They have a charm that partakes more of the spiritual than the material . . ." ³ In 1929, Piazzoni began what one author calls "his most ambitious mural project," the murals for the Main Library (Westphal, 1986). As stated in the SEIR, the 10 original panels were completed by 1932 and were installed in the second floor stair loggia. Among the primary donors for the \$25,000 commission were Mr. and Mrs. Ansley K. Salz, leading Piazzoni patrons. During the Depression, Piazzoni worked for the Federal Art Project, for which he began work on four additional murals for the library, which were installed in 1975. Two other panels were unfinished when Piazzoni died at his Carmel Valley ranch in 1945.

Although not well known beyond what his grandson called "the few friends and admirers who fiercely defend his genius" (Chatham, 1987), Piazzoni was highly regarded by other San Francisco artists during his career in the city: reportedly a dozen fellow artists wrote to the Library Board that Piazzoni was the most capable of executing the murals on the loggia walls. As stated on p. 55 of the SEIR, Piazzoni at the time was "known in the art press as the 'dean' of San Francisco artists." Although his national and international reputation may have suffered by virtue of east coast artists' disregard for their western counterparts, Piazzoni wielded considerable influence in San Francisco, which in the early 20th century was the major cultural outpost on the west coast. He was the "moving force" behind the San Francisco Institute of Art, which was a focal point for many San Francisco artists (Albright, 1985).

The Piazzoni murals, in the view of those who oppose their removal, are a site-specific installation whose removal would dramatically and adversely alter the murals' value as works of art. In the same 1928 letter to Library trustee Albert Bender that is quoted on p. 56 of the SEIR, Piazzoni stated, "I may also add in conclusion that this particular Library has a stairway unequalled for setting the panels in the natural light, and all as perfect as could be desired" (Piazzoni, 1928). As stated in the SEIR, the original ten murals were commissioned for the library in 1929, financed by a subscription campaign by San Francisco citizens, and installed in 1932. In addition to Mr. and Mrs. Ansley Salz, noted above, others instrumental in raising the money for Piazzoni's library commission included Library trustee Albert Bender and noted San Francisco merchants A.B.C. Dohrmann and F.J. Koster.

The original ten murals are grouped in two sets of five, on either side of the second floor stair loggia, as noted in the SEIR (p. 56). As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, photographs of the Piazzoni murals have been added to the SEIR. Included are illustrations of "The Land" and "The Sea," the two five-panel sets of murals that each form single image, as if viewed through a series of windows (new Figures 10A and 10B, SEIR pp. 56a and 56b). The decorative

³ Quoted in Westphal, 1986.

(non-structural) columns of the outer walls of the loggia separate each panel from the next. The panels depicting the sea are to the north, towards San Francisco Bay, while those depicting the land are to the south, in the direction of the Peninsula. The other four panels in the old Main Library building, and the two that were not finished at Piazzoni's death, are singular and not part of a larger composition, although the use of subtle color tones is the same. (See also new Figures A-10 and A-11, SEIR Appendix A, which were provided in Section F of the published Draft Summary of Comments and Responses.)

Please see also the response to Comment J-5, p. C&R.80, for additional discussion of professional and lay opinions on the disposition of the Piazzoni murals. The conservators who evaluated the murals (see SEIR p. 56) did not hypothesize whether another type of canvas would be more or less susceptible to damage than the existing cotton canvas if removal of the murals is attempted. Regarding the condition of the walls on which the murals are mounted, please see the response to Comment F-10, p. 53, below.

- F-7) Frank Vincent DuMond (1865-1951) was born in Rochester, NY, of French parents, and studied in Paris, along with his brother, Frederick, at the Académie Julian and the École des Beaux-Arts. Frank DuMond and his brother both taught at the Art Students' League in New York City, where Frank influenced thousands of other artists as an instructor there for 49 years. A nationally recognized muralist, illustrator and teacher, Frank DuMond was elected a member of the National Academy of Arts in 1906, and was honored with medals at several international expositions, including Boston, Atlanta, Buffalo and St. Louis. He also received a medal at the Paris Salon (Hughes, 1989; SFAC, undated).

DuMond, a member of the International Jury of Awards during the 1915 Panama-Pacific Exposition (PPIE) in San Francisco, created two large murals for the exhibition that now hang in the old Main Library Building. In the Larkin Street reading room (Room 201) is "Pioneers Leaving the East," which depicts a youth bidding farewell to his family as part of a westward procession of pioneers that includes a wagon bearing household goods and the "Family Ideal" represented by the Preacher (portrayed as William Taylor, a famous early California street preacher), the Jurist, the Schoolmistress, and the Child. Also pictured, as the Pioneer, is early California adventurer James "Grizzly" Adams. In the Fulton Street reading room (Room 210) is "Pioneers Arriving in California," depicting the Artist (William Keith), the Writer (Bret Harte), the Scholar, the Architect, the Sculptor, the Youth and the Family, arriving in the west and being greeted by Conquest seated amid fruits and abundance. Also pictured are Father Junipero Serra and Spanish Army Captain Juan Bautista de Anza.

While on display at the PPIE, DuMond's murals hung on either side of the Arch of the Setting Sun, at the west end of the Court of the Universe, just northwest of the Tower of Jewels, the 435-foot-tall central structure of the fair. (Leo Lentelli, sculptor of the five figures above the old Main Library's Larkin Street entrance, was among the sculptors who created giant figures atop the Arch of the Setting Sun.) The DuMond murals were given to the San Francisco Public Library by the PPIE directors. As noted in the SEIR (p. 68), the murals were moved to the library following the close of the exposition.

A conservator who examined the DuMond murals noted that they are painted on a coarse, moderately heavy burlap or jute fabric that is oxidized and brittle as a result of age. The murals were mounted directly into a bed of wet plaster, with no adhesive; based on the conservator's observations of other murals dismounted from the PPIE, this technique of mounting directly in plaster may have been used at the exposition as well. At the library, the edges of the murals are also tacked to wooden strips around the edges of the murals. The murals detach easily from the plaster when pulled. The paint is generally sound. "Pioneers Leaving the East," in the Larkin Street reading room, appears drier, perhaps due to greater light exposure on this west-facing wall. This mural also appears to have suffered more fading than the other. Both murals have slight abrasions (Rosenthal, 1996).

Because of their bonding to wet plaster, the DuMond murals can likely be removed from the walls with a loss of 2 percent to 5 percent of the design. In the estimation of the conservator, this damage could be relatively easily repaired without disfiguring the murals, since the "busy" design would conceal conservation treatment. The conservator noted that the murals were moved once, albeit when younger, perhaps from a similar mounting system. She also stated that, because these murals' original setting was destroyed with the close of the PPIE, moving them to another location where they may continue to be viewed would not further alter the artist's intent or diminish the artistic sensibility of the murals, assuming a suitable relocation site were found (Rosenthal, 1996).

As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, photographs of the DuMond murals have been added to the SEIR in Figure A-12 as SEIR Appendix A.

- F-8) This comment apparently addresses the Asian Art Museum's stated objective to display its collection in an environment that the commenter argues may be incompatible with the original setting of portions of the collection. In the view of the SEIR authors, the sponsor's objectives and the museum's curatorial decisions, while worthy of consideration during the project approval process, are not physical effects on the environment as defined by CEQA, and no response is required. Please see also the response to Comment O-1, p. C&R.118.
- F-9) The comment is noted. The EIR authors appreciate the commenter's observations regarding the comprehensiveness of the Project Description.
- F-10) The interior walls of the second floor stair loggia on which the Piazzoni murals are mounted are separate from the brick walls that make up a portion of exterior walls of the light courts on either side of the Monumental Staircase. There is a gap of between 8 inches and 1½ feet between the two walls. The interior walls, constructed of travertine marble and of a plaster mixture cast in blocks to look like travertine (described as "faux travertine") are supported by wire mesh and bands and angles of iron that were affixed to the travertine and faux travertine by applying strips of cloth dipped in plaster; once the plaster dried, it formed a rigid bond. The angle iron is in turn

attached to the rear of the exterior brick wall, providing support to the interior wall (Huston, 1997; Judd, 1997).

As to whether the seismic strengthening program requires removal of the Piazzoni murals, there is a disagreement among experts who have reviewed the proposed project and it is disclosed in the SEIR(CEQA Guidelines Sec. 15151). As stated on p. 68 of the SEIR:

A preservation architect who reviewed the project on behalf of the Board of Supervisors' Piazzoni Review Panel has stated that seismic strengthening of the loggia could be accomplished without removing the faux travertine panels on which the murals are mounted by installation of structural members between the panels and the exterior brick walls, which would allow the murals to remain in place (Judd, 1997).

This preservation architect⁴ states, in his *Piazzoni Murals Summary Memorandum*, that "it is possible to develop a structural bracing scheme and method of construction that keeps the travertine walls, murals and ceiling in place while carrying out the work. There are several alternative ways of accomplishing this. . . ." According to the architect, a comparable system was installed between exterior brick walls and interior plaster walls at the Willis Polk-designed Filoli Mansion in Woodside. This approach could allow the murals to be preserved in place during reconstruction. One of the conservators who evaluated the murals as part of the Piazzoni Murals Review Panel described a means of protecting the murals during project construction by installing a cushioned rectangular panel directly over each mural. The wooden panels would fitted with a gasket to inhibit dust and moisture from reaching the painted surface, braced tightly against the murals, and would be fireproofed on their exterior surfaces. Although there can be no guarantee that the murals would not sustain any damage, the conservator stated in the body of her report, "Through proper preparation, care, and protection, architectural work may proceed without damage to the murals" (Silver, 1997).

However, the conservator selected by the Asian Art Museum to serve on the Board of Supervisors' review panel has stated that "the murals must be removed for their safety and cannot be preserved *in situ* during construction." Reasons cited include the loss of environmental protection once the exterior walls are removed; potential impacts on the travertine walls due to vibration required for demolition of the brick exterior walls; and potential damage to the murals during the installation of seismic bracing, if the murals were retained in place during the construction (Huston, 1997).

Regarding the Piazzoni Murals Review Panel noted above, this panel was established by the Asian Art Commission at the request of the Board of Supervisors, which passed resolution 376-97 in April 1997, "urging the Asian Art Commission to establish a Piazzoni Murals Review Panel consisting of three members, including the architect, Gaetana Aulenti and two other highly qualified art conservators, one chosen by the Asian Art Commission and the

⁴ Bruce Judd; not the same as the project's preservation architect, Page & Turnbull.

other chosen by the Committee to Retain the Piazzoni Murals.” The panel was to report back to the Board of Supervisors on whether the murals could be safely removed from the old Main Library building and, if the murals were retained in place, how the murals could be protected during construction and how the Asian Art Museum’s program could be accommodated. The panel ultimately did not submit a single, unanimous report, but instead each panelist submitted a separate report. As noted on SEIR pp. 66-68, the project architect and the conservator selected by the museum (Huston, 1997) stated that removal of the murals prior to construction would offer the best chance of avoiding damage to the murals, while the conservator selected by the Committee to Retain the Piazzoni Murals (Silver, 1997), argued against removal, stating that the murals could be protected during construction (as described above) and that removal would be improper from the perspective of art preservation and conservation.

Please see also the response to Comment J-4, p. C&R.78 below, for a discussion of the museum’s proposed seismic strengthening scheme as it relates to the stair loggia and the Piazzoni murals.

- F-11) The SEIR authors concluded, based on the information that was available, that the project would result in a significant, unavoidable effect on historic resources. Given the alterations proposed as part of the project to accommodate the museum program, apart from the seismic upgrade, this conclusion would not be altered by refinement of the seismic upgrade scheme. It should be noted that refinement of the seismic program could be required as work proceeds, depending on what conditions are encountered within the building, and/or as building code requirements for seismic upgrade and advances in engineering continue to develop.
- F-12) Regarding the moat proposed as part of the seismic strengthening component of the project, please see the response to Comment B-2, p. C&R.24.
- F-13) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, Figure 10D, presenting the proposed project and the new Main Library side-by-side, has been added to the SEIR (p. 60b).
- F-14) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, the SEIR reached its conclusion that the project as proposed would result in a significant, unavoidable adverse effect on historic architectural resources. Regarding the stucco-like finish proposed for the Hyde Street elevation of the proposed lower level extension, the SEIR on p. 62 summarizes the Preliminary Assessment by the project’s preservation architect (which is fully set forth in SEIR Appendix A) and adequately describes this feature, stating that “the new single-story facade [with synthetic stucco finish] would not be compatible with the old Main Library in terms of materials or the blank face it would present to the street (Page & Turnbull, 1998, p. 7).”

Regarding any resultant effect on the historic districts, the lower level expansion would be constructed near the corner of Hyde and McAllister Streets, which faces away from City Hall,

the focus of the historic district, and from Civic Center Plaza. Further, as indicated in Figure 3 (revised), SEIR p. 31, and Figure 6, SEIR p. 37, the lower level extension would be obscured from view along Fulton Street by the existing stone plinth on which the building sits and the proposed stone wall around the Chinese Garden. Although the entire exterior of the old Main Library building is listed in Planning Code Article 10, the addition would not directly affect the old Main Library building itself, nor would it affect views of the building from key points in the districts. The project sponsor has indicated that, should the subsequent project phases be undertaken at the 45 Hyde Street site, the lower level extension would be reclad in the same masonry as would be used as cladding in the future expansion (Otsea, 1998).

- F-15) The SEIR on p. 61 describes the windows and their effect, citing the preservation architect's Preliminary Assessment, "Replacement of the existing glazing in the two-story windows and installation of new translucent windows behind the existing windows on the principal Larkin and Fulton Street facades would alter the visual appearance of these facades, although the new glazing would be similar in color and reflectivity to the existing, and the approach to these windows would avoid obtrusive changes to exterior glazing (Page & Turnbull, 1998, p. 3). The proposed emergency staircase inside the Fulton Street reading room would not be readily visible from the outside behind the new translucent white glass."
- F-16) As stated on SEIR p. 54, citing a conditions assessment prepared for the museum and the San Francisco Art Commission, the statues by Leo Lentelli "have experienced degradation from exposure to weather, and much of the surface detail has been worn away." (But as noted in the response to Comment F-2, above, the precise original condition of the statues may not be known, according to the San Francisco Art Commission.) The SEIR does not state that the statues cannot be repaired, either in place or off-site. The SEIR describes the statues and their condition and evaluates the museum's proposal, which is to remove the statues as part of its program design. The museum proposes to use the area occupied by the statues as part of its informational signage program, through the installation of banners highlighting special exhibitions and other information about the museum (see Figure 10C, Architect's Rendering of Larkin Street Facade, SEIR p. 60a). As stated on SEIR p. 61, citing the preservation architect's Preliminary Assessment, "the proposed removal of the statues on the Larkin Street facade would eliminate a distinctive feature that characterizes the old Main Library building (Page & Turnbull, 1998, p. 4)." The SEIR identifies a mitigation measure on p. 85 under which the Asian Art Museum would work with the San Francisco Art Commission to relocate the Lentelli statues.
- F-17) As stated on SEIR p. 61, citing the preservation architect's Preliminary Assessment, "the dining terrace would be noticeable, but 'would not upset the fundamental relationship between the building and the landscape.'" The decision-makers must decide, based on a variety of information, including information from the SEIR, the Certificate of Appropriateness application, and other materials, whether the dining terrace would be a positive addition to the Fulton Street mall and the Civic Center Historic District. The decision is not the function of the SEIR.

- F-18) As stated on SEIR p. 65, citing the preservation architect's Preliminary Assessment, "With installation of the new third floor level, the five rooms would lose the effect of the space created by their existing two-story height. Installation of the new third floor level would adversely affect these Exceptionally Significant Interior Spaces, as designated in Planning Code Article 10, Appendix J, by fundamentally altering the existing proportions of the rooms. This change would be visible from the exterior, at least under certain lighting conditions." As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, interior photosimulations of the two large reading rooms, converted to two stories of galleries, have been added to the SEIR, which illustrate the effect of the division of these rooms to two stories. The new figures, 10E and 10F, are presented on pp. 65a and 65b.
- F-19) Although full details are not known, the SEIR assumes, in the case of interior spaces to be demolished, that trim materials would be lost. The SEIR identifies mitigation measures on p. 85 to preserve, replace in kind, or salvage, as applicable, materials deemed Significant or Very Significant. For interior spaces to be altered but retained, such as the Great Hall (Room 200) and the large second floor reading rooms (201, 210), as stated on p. 65, "certain trim and finish materials would . . . be retained, where feasible; bookshelves would be removed, and other finish materials would be replaced or eliminated."

As stated in the response to Comment F-5, p. C&R.49, interior inscriptions would be retained.

- F-20) Regarding effects on the old Main Library building of removal of the Piazzoni murals, the SEIR states (p. 66), "Removal of the Piazzoni murals would displace from the old Main Library building works of art that, in the view of several experts, are considered integral to the building . . . , and [citing the preservation architect's Preliminary Assessment] would remove 'distinctive features and examples of craftsmanship which contribute to the significance of the building.'" The SEIR's conclusion, on p. 70, that the project as proposed would result in a significant, unavoidable adverse effect on historic architectural resources is based, in part, on the proposed removal of these murals. (Please see also the response to Comment F-6, p. C&R.50.)

Regarding potential damage if the Piazzoni murals are removed, as noted by the commenter, the SEIR states, on p. 66, that conservators who examined the murals are divided in their opinion as to the damage that would occur: of five conservators, three concurred in the conclusion that the murals could be safely removed from the walls, albeit with some minor damage, assuming that great care were taken in the process, while two conservators concluded that removal would likely cause more serious damage (estimated loss of between 7 percent and 20 percent of the surface) as the canvas was pulled away from the wall.

Regarding the sponsor's reasons for removal of the murals, the SEIR includes a statement from the Asian Art Museum on p. 68, stating the sponsor's reasons for removal; in summary, the sponsor believes that removal of murals is integral to the museum design; that their retention would compromise the museum design; and that retention of the murals would restrict exhibition options for the museum.

- F-21) According to the project architect, synthetic stucco was selected as the exterior finish for the lower level extension because it is anticipated that this finish would be reclad in masonry or comparable finish material if the future expansion at 45 Hyde Street were constructed (Otsea, 1998).
- F-22) The comment is noted. The SEIR states, on p. 70, "Because design plans for the auditorium/theater addition are conceptual at this time, a separate Certificate of Appropriateness would be required at such time as the design were more fully developed."
- F-23) In response to comments on the DSEIR, additional graphics depicting the building and proposed changes, allowing further comparison of before and after conditions, have been included in the FSEIR (see Figures 8A – 8D, pp. 39a – 39d; Figure 9A, p. 41a; Figures 10A and 10B, pp. 56a and 56b; Figures 10C and 10D, pp. 60a and 60b; Figures 10E and 10F, pp. 65a and 65b; Figures 11A and 11B, pp. 67a and 67b; and Figure 11C, p. 69a; as well as Figures A-2 through A-12 in Appendix A).

As stated in the response to Comment A-4, p. C&R.14, the SEIR has been revised to include the opinions of the National Park Service (NPS) and the State Historic Preservation Officer (SHPO) that the significant, unavoidable adverse effect on historic architectural resources (the old Main Library building) would encompass effects on the National Register-listed and local historic districts as well. (The NPS and SHPO comments are included in this document as Comment Letters A and B, respectively; these letters amplify and expand upon the NPS and SHPO concerns expressed in the September 1997 letter referenced on SEIR p. 71.)

- F-24) As stated on SEIR p. 74, there are several other buildings in the Civic Center that have hipped roofs. While not precisely the same shape, the hipped roof mechanical penthouse of the Asian Art Museum is "intended to respond" to these other buildings, which include the Old Federal Building and California State Building, each across the street from the old Main Library building; and the Civic Center Courthouse, Opera House, Veterans' Building, as well as newer buildings such as the Edmund G. Brown (State Office) Building and Davies Symphony Hall. The project would not otherwise alter the massing of the old Main Library building and would not affect its approximately 80-foot cornice line, which is similar to other key buildings in Civic Center, and the SEIR thus concludes that "the form of the penthouse addition would generally be consistent with the scale and massing of some Civic Center buildings."

As noted in Comment letters A and B, the NPS and SHPO have stated that the hipped roof penthouse would create a false historic appearance on the old Main Library building.

- F-25) As stated on SEIR p. 65, citing the preservation architect's Preliminary Assessment, "Installation of the new third floor level would adversely affect these Exceptionally Significant Interior Spaces, as designated in Planning Code Article 10, Appendix J, by fundamentally altering the existing proportions of the rooms. This change would be visible from the exterior, at least under certain lighting conditions." When visible from Fulton and Larkin Streets, (but not McAllister Street contrary to the comment), the new third floors would alter exterior views of the old Main Library. However, as with other exterior changes, this addition would not adversely affect the principal distinguishing feature of the National Register historic districts – the composition of Beaux Arts structures centered around City Hall. The SEIR has identified an adverse impact on

these Exceptionally Significant Interior Spaces and described the impact, including visibility from outside under certain lighting conditions. These would include certain night lighting conditions. (Please see also the response to Comment A-4, p. C&R.14.)

- F-26) Regarding recommended Item 1, the Asian Art Museum has consulted with City departments to determine whether certain items removed from the interior of the old Main Library building could be reused by other departments. The museum is also considering working with a salvage company during construction to maximize the potential for reuse of building materials (Otsea, 1998).

Regarding recommended Item 2, documenting removed material, please see the response to Comment B-6, p. C&R.26.

Regarding recommended Item 3, supervision of facade work by a preservation architect in accordance with the Secretary of the Interior's *Standards*, the Preliminary Assessment prepared by the project preservation architect states, "The cleaning and repair will preserve the masonry, a distinctive character-defining element of the exterior," which would be consistent with Secretary of the Interior's Standard No. 5. Further, "The gentlest effective treatment will be used for cleaning. Characteristics and tooling of new mortar will match old mortar. Final design documents should be verified" (Page & Turnbull, 1998, p. 8). As noted in the first mitigation measure on p. 85, "The project sponsor has retained the services of a preservation architect, through construction of the Asian Art Museum." Therefore, the preservation architect would review the cleaning and repair of exterior masonry. Specific language could be included in conditions of project approval if the project is approved.

Regarding recommended Item 4, retention of the Lentelli sculptures: Alternative B, the Full Preservation Alternative, would not remove these sculptures.

Regarding recommended Item 5, the potential for a series of Certificates of Appropriateness, the Planning Commission, in its consideration of the application for a Certificate of Appropriateness, could determine that additional information is required or that, as recommended by the commenter, a Certificate of Appropriateness should be granted only for certain aspect(s) of the project, pending further design development. As noted in the response to Comment F-1, p. C&R.46, the Landmarks Preservation Advisory Board voted on September 2, 1998, to recommend disapproval of a Certificate of Appropriateness for the proposed project.

- F-27) Regarding alternatives, as stated above, the decision-makers could require that certain components of the alternatives be incorporated into the project or approve an alternative to the project or some combination of the project and/or alternatives, as long as those components were adequately analyzed in the Main Library/Asian Art Museum FEIR, the FEIR Addendum, and SEIR.
- F-28) The following is added as two new final sentences under "Alternative A" on SEIR p. 98:

However, if the building remained vacant for an extended period of time, this alternative could indirectly result in deterioration of the building due to neglect, potentially including damage to the exterior and to Exceptionally Significant Interior Spaces, as identified in the Planning Code. Under this alternative, an important San Francisco cultural resource would not locate at the Civic Center.

Regarding the location in the Civic Center, the project sponsor's objectives on pp. 19-21 of the SEIR note that, by relocating to the old Main Library building, the Asian Art Museum would be able to establish its own identity (distinct from the deYoung Museum) and "will be more closely connected with the City in the public mind and will be accessible to the entire Bay Area." Both the adopted Civic Center Area Plan of the San Francisco General Plan (SEIR p. 47) and the draft Civic Center Plan call for the location of cultural facilities in the Civic Center.

- F-29) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, floor plans for Alternative C have been added to the SEIR as Figures 16 through 19, pp. 109a-109d. The new figures use a dashed line to depict a proposed circulation path.
- F-30) The San Francisco Building Code (Sec. 414(h)) defines a mezzanine as "an intermediate floor placed within a room." The Building Code limits the floor area of mezzanine(s) to one-third of that of the room in which the mezzanine(s) are located.
- F-31) As stated in the response to Comment B-4, p. 25, the decision-makers must determine, based on evidence in the whole of the record – including, but not limited to, the SEIR, whether alternatives are feasible. The project sponsor may provide evidence as to the infeasibility of alternatives outside the SEIR. That is, the project sponsor (and others) will have the opportunity to present other, more detailed information to the decision-makers during their consideration of project approval. Please see also the responses to Comment J-7, p. C&R.83, and Comment TT-1, p. C&R.141, below.
- F-32) Regarding the facing of the Hyde Street addition, please see the response to Comment F-14, p. C&R.55.
- F-33) The comment is appreciated.

REFERENCES - LETTER F

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Albright, Thomas, *Art in the San Francisco Bay Area, 1945-1980: An Illustrated History*. University of California Press, 1985.

Chatham, Russell, "A Reflection on Gottardo Piazzoni," Presented September 26, 1987, at Hertz Hall, University of California, Berkeley

Hughes, Edan Milton, *Artists in California, 1786-1940*. Hughes Publishing Co, San Francisco, 1989.

Huston, Perry C., art conservator, "Piazzoni Murals Review Panel Report." This report was prepared in response to the Board of Supervisors' creation of a Piazzoni Murals Review Panel. Mr. Huston was selected for the panel by the Asian Art Museum. 1997

Judd, Bruce D., FAIA, Architectural Resources Group, *Piazzoni Murals Summary Memorandum*, September 20, 1997.

Killoran, Jim, Project Manager, New Asian Project, memorandum to Carol Roos, San Francisco Planning Department, November 6, 1998b.

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O'Connor, Francis V., Ph.D., "The Murals of Gottardo Piazzoni for the San Francisco Public Library: 1929-1945," 1996.

Otsea, Mark, HOK/LDA/RWA joint venture architects, memorandum to Jim Killoran, Project Manager, New Asian Project, October 19, 1998; Attachment A in Killoran, 1998b, memorandum, cited above.

Page & Turnbull, *Historic Structure Report, Old Main Library, San Francisco, California*, August 19, 1998.

Piazzoni, Gottardo, letter to Albert M. Bender, June 3, 1928; quoted in O'Connor, 1996.

Rosenthal, Anne, art conservator, "Examination and Condition Report and Recommendations for Conservation Treatment, Murals in the Old Main Library, San Francisco, California." Prepared for the Asian Art Museum and the San Francisco Art Commission. June 1996.

SFAC (San Francisco Art Commission), undated biographical sketches on artists whose work appears in the old Main Library building.

Silver, Constance S., art conservator, "The Piazzoni Murals Review Panel Report; Appendix 2: Outline for Protection of the Piazzoni Murals in Place." This report was prepared in response to the Board of Supervisors' creation of a Piazzoni Murals Review Panel. Ms. Silver was selected for the panel by the "Committee to Retain the Piazzoni Murals." July 25, 1997

Westphal, Ruth Lily, ed., *Plein Air Painters of California: The North*. (essay by Janet B. Dominik) Westphal Publishing, 1986.

Wharton, Glenn, Wharton & Griswold Associates, Inc., "San Francisco Main Public Library Allegorical Sculptures: Conditions Assessment." Prepared for the San Francisco Art Commission and the Asian Art Museum. March 15, 1996.



SAN FRANCISCO ART COMMISSION

August 10, 1998



PROGRAMS

CIVIC ART COLLECTION
CIVIC DESIGN REVIEW
COMMUNITY ARTS
& EDUCATION
CULTURAL EQUITY GRANTS
PS SYMPHONY CONCERTS
PUBLIC ART

San Francisco Planning Department
Major Environment Analysis Team
1660 Mission Street, 5th Floor
San Francisco, CA 94103

STREET ARTISTS LICENSES
SUITE 70
415.252.2581

Attn: Carol Roos, EIR Coordinator
97.750E - Asian Art Museum

COMMISSION GALLERY
401 VAN NESS AVENUE
415.554.6080

RE: Asian Art Museum - Draft Supplemental Environmental
Impact Report

RECEIVED
AUG 11 1998
CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

Dear Carol:

The paragraph on page 68 which begins "The Board of Supervisors, on December 15, 1997,..." contains an error. The resolution urged the Asian Art Commission, not the San Francisco Art Commission, to remove the Piazzoni murals.

1

Thank you for making this correction to the document.

Sincerely,

Debra Lehane
Civic Art Collection Manager



LETTER G – SAN FRANCISCO ART COMMISSION

- G-1) The correction noted by the commenter has been made on p. 68, as follows (new language is underlined; deleted language is indicated with ~~striketrough~~):

The Board of Supervisors, on December 15, 1997, passed a resolution urging the ~~San Francisco~~ Asian Art Commission to remove the Piazzoni murals from the old Main Library building prior to the start of construction on the Asian Art Museum project and to explore options for relocation and display of the murals, subject to completion of environmental review.



SAN FRANCISCO MUNICIPAL RAILWAY 949 PRESIDIO AVENUE, SAN FRANCISCO, CALIF. 94115 415-673-6864



MEMORANDUM

To: Carol Roos, Major Environmental Review

Through: Peter Straus, Mgr. of Service Planning

From: James D. Lowé, Transit Planner *J. Lowé*

Subject: Asian Art Museum Supplemental EIR - 97.470E!

Date: 22 July '98

In response to your request for review of the Draft Supplemental EIR for the Asian Art Museum project; the San Francisco Municipal Railway Service Planning staff have no further comments. We did, however, comment earlier and I have attached those comments as they are still pertinent.

attachment

cc: N Whelan, CFO
PS, JDL, SP Chron

M E M O R A N D U M

To: Carol Roos, Office of Environmental Review

Through: Peter Straus, Dir. of Service Planning

From: James D. Lowé, Transit Planner

Subject: Asian Art Museum, PDEIR - 97.750E

Date: 2 Dec. '97

In response to your request for comment on the Preliminary Draft EIR I for the Asian Art Museum Project, the Municipal Railway Service Planning staff have the following comments:

<u>Page</u>	<u>Comment</u>	
P. 33-34	Transit Impacts - Muni reviews transit impacts on a cumulative basis of 63 passengers per coach. It should be noted that Muni generally operates at capacity during the peaks. Cumulatively, the 175 new P.M. peak transit riders noted equate to approximately 2.78 coaches of demand. It is our opinion that this is a measurable impact on transit in the area and should be mitigated as such.	1
n/a	Existing Transit Service and Stops - The bus stop and shelter located on Larkin at the southeast corner of McAllister and on the project site should be maintained. Moreover, the stop should continue to accommodate a passenger shelter as currently exists. A polestop exists mid-block on the south-side of McAllister between Larkin and Hyde. This stop should also be maintained. Generally, transit riders will walk 1,000 to 1,200 feet to access public transit ("1/4 mile or 1320 feet) is used in our SRTP. Using this criterion, most BART riders would probably walk between the site and Civic Center station.	2

cc: Louis Johnson, Dep. Dir. Operations
PS, JDL, SP Chron

H:Asian.EIR

LETTER H – SAN FRANCISCO MUNICIPAL RAILWAY

- H-1) The comments from MUNI were considered when originally submitted, during preparation of the DSEIR. The analysis of transit impacts in the Main Library/Asian Art Museum FEIR and the SEIR was conducted on a corridor basis, rather than a line-by-line basis. As discussed in the Main Library/Asian Art Museum FEIR (p. 138), to which the SEIR is a supplement, "More than 15 MUNI lines, including the underground Metro lines, stop within one block of the project site; about 20 MUNI lines are within one-quarter mile walking distance. BART, SamTrans, and Golden Gate Transit also stop within one block of the site." This information remains current for the purposes of analysis. The EIR used the corridor-based analysis because it is not possible to predict accurately which individual transit lines future riders would use, only which corridor they would use. Additionally, it can be assumed that if a rider desired to take one line that was operating at or near capacity, he/she might switch to another line, within the same corridor, that was operating below capacity. Therefore, the corridor-based analysis gives a more accurate prediction of overall MUNI operations than would a line-by-line analysis. The 145 net new MUNI trips (175 trips for MUNI and BART combined) generated by the project would be dispersed among these various lines rather than concentrated on one line, in one direction at one time. As summarized on SEIR p. 79, transit trips generated by the Asian Art Museum would contribute incrementally to cumulative increases in transit ridership but would not, by themselves, measurably affect transit service.
- H-2) The comment is noted. The project would not require any permanent relocation of transit stops. During construction, as stated on p. 44, it is anticipated that the curb lane and sidewalk would be closed on McAllister, Hyde and Larkin Streets. Temporary relocation of stop(s) could be required to ensure passenger safety. As stated on p. 80, the project sponsor and construction contractor(s) would meet with MUNI staff and other city staff to determine feasible means of reducing construction impacts.

Regarding BART, the analysis in the in the Main Library/Asian Art Museum FEIR, the FEIR Addendum, and the SEIR assumed patrons would walk to and from the Civic Center BART station.

Asian Improv aRts

123 Townsend Street Suite 345
San Francisco, California 94107

Tel: (415) 221-2608 Fax: (415) 221-0367 email: asiaimprov@aol.com



San Francisco Planning Commission
401 Van Ness, Room 428
San Francisco, CA

RE: Support for Asian Art Museum SEIR.

Dear Commissioners:

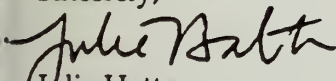
I am writing on behalf of Asian Improv aRts to urge the Planning Commission to proceed in an expeditious manner to certify the EIR for the Asian Art Museum's move to the Old Main Library site.

Asian Improv aRts is a non-profit arts organization founded in 1987 by musicians Jon Jang and Francis Wong in 1987. Its mission is to work for the cultural empowerment of Asian American communities through presenting, commissioning and recording the adventurous, cross-cultural work of Asian American musicians reflecting the Asian American experience. In addition to our artist in residency programs and other educational activities, we have an independent record label, Asian Improv Records with a catalog of over 35 recordings. The record label representing the work of over 15 local and national artists, is the most comprehensive collection of Asian American jazz and is recognized nationally and internationally as part of San Francisco's unique Pacific Rim culture.

Over the years, Asian Improv and its network of artists have had the opportunity to work with the Asian Art Museum on such projects as the Asian American Jazz Festival and other programs emanating from its Outreach and Education Department. We have seen the valuable and critical role that the Asian can play in the presentation, development and creation of Asian American art and culture. We have also experienced the serious deficiencies of the current space in supporting the full potential of our arts community. So we are excited about and feel the urgent need for the Asian to find a new, more spacious home with greater access and a design more conducive to its multifaceted institutional mission.

We believe that the EIR and SEIR have been conducted in a thorough and considerate manner and urge the Planning Commission to certify the project for the next step. Our community needs are urgent! Our Asian American arts community is severely underserved. Our artists deserve better than the City has provided so far. The Asian's move to the Old Main Library site and its expeditious renovation represents a major step to alleviate this situation. Your support is deeply appreciated.

Sincerely,


Julie Hatta
Producer

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LETTER I – ASIAN IMPROV ARTS

- I-1) The comment is noted. The comments do not address the specific content of the Draft SEIR or its adequacy or accuracy, and no response is required.

KELLY L. DRUMM
Attorney at Law

1168 Dolores Street
San Francisco,
California 94110
Phone: (415) 826-9067
Fax: (415) 826-9421



August 20, 1998

Ms. Hillary Gittleman
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103
Fax: (415) 558-6409

Re: Asian Art Museum - Draft Supplemental Environmental Impact Report
Comments Of The Foundation for San Francisco's Architectural Heritage

Dear Honorable Commissioners:

The Foundation for San Francisco's Architectural Heritage has retained the undersigned to review the Draft Supplemental Environmental Impact Report prepared for the Asian Art Museum, and on its behalf, I submit the following comments. My law practice specializes in environmental law, including land use and water law, with an emphasis on the California Environmental Quality Act. Based upon my review, it is my opinion that in general, the Draft SEIR lacks an adequate discussion of the impacts associated with the Asian Art Museum's proposed design plans to alter the interior of the Old Main Library Building ("the Project").

The purpose of the CEQA process of requiring the preparation of environmental documentation (such as an EIR, SEIR, or Negative Declaration), is to compel agencies to first identify the environmental effects of a project, and then to mitigate those adverse effects through the imposition of mitigation measures or through the selection of feasible alternatives. See Pub. Res. Code §21002, Cal. Code Regs., title 14 ("CEQA Guidelines") §§15002(a)(3), 15021(a)(2), (c), 15041(a), 15063(c)(2), 15091(a), 15093, 15096(g), 15126(c), (d), 15365, and 15370; see also Sierra Club v. State Board of Forestry, (1994) 7 Cal.4th 1215, 1233. The Draft SEIR, in its present form, fails to properly identify the impacts associated with the Project on Exceptionally Significant Interior Spaces, and as such, the efficacy of the proposed mitigation measures is uncertain. Moreover, in the absence of an adequate impact analysis, it is impossible for the Planning Commission to assess whether Alternatives to the Project were properly rejected as infeasible.

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In particular, I believe the Draft SEIR has five significant flaws. First, the Project Description section of the Draft SEIR does not adequately describe the impact of the Project on Exceptionally Significant Interior Public Spaces. Secondly, the Draft SEIR mistakenly asserts that in order to seismically retrofit the building, the loggia walls (upon which the Piazzoni murals are mounted) need to be demolished. Thirdly, the Draft SEIR fails to adequately analyze the full impacts associated with the removal of the Piazzoni murals and the destruction and/or alteration of other Exceptionally Significant Interior Spaces, in light of the significant impacts associated with such activities which cannot be fully mitigated. Moreover, the rationale for proceeding with the Project in light of the unmitigated impacts to Exceptionally Significant

2

The Foundation for San Francisco's Architectural Heritage
 Comments on Draft SEIS - Asian Art Museum
 August 20, 1998
 Page 2

Interior Spaces has not been explained. Fourth, the proposed mitigation for the removal of the Piazzoni murals is inadequate. And lastly, the rationale for the rejection of Alternative B (Full Preservation Alternative) and Alternative C (Reduced Impact on Historic Architectural Resources) is flawed and is not supported by substantial evidence in the record.

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 Cont.

On the basis of the above-described five inadequacies, which will be discussed in more detail below, it is the position of The Foundation for San Francisco's Architectural Heritage that the Draft SEIR should not be certified as legally adequate for the purpose of approving the Project, and that additional investigation into Project impacts, mitigation measures, design modifications and alternatives should be conducted.

I. The Project Description Section (Chapter II) of the Draft SEIR Should More Accurately Describe The Impacts of the Project on "Exceptionally Significant Interior Public Spaces"

CEQA requires that the SEIR contain a section which accurately describes the Project in a way that is meaningful to the public, to other reviewing agencies, and to the decision maker. See CEQA Guideline §15124. Only through an accurate view of the project may affected outsiders and public decision makers balance the Project's benefit against its environmental costs, consider mitigation measures, and weigh the feasibility of other Project alternatives. A curtailed or distorted project description may stultify the objectives of CEQA's reporting process. See County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192-193.

It is the position of The Foundation for San Francisco's Architectural Heritage that the project description (Chapter II of the Draft SEIR) distorts the impacts of the Project by failing to clearly indicate which Exceptionally Significant Interior Spaces will be impacted. For example, on page 20, under the subheading of "Project Sponsor's Objectives," the SEIR states that the Project "design would retain historically significant architectural spaces and details of the interior," and proceeds to list the aspects of the interior that will be retained under the Project. This statement is misleading in that it gives the impression that all Exceptionally Significant Interior Spaces will be preserved. Moreover, the list combines areas defined as Exceptionally Significant Interior Public Spaces under Article 10, Appendix J, §10(b) of the San Francisco Planning Code, with other non-listed features, such as skylights, inscriptions, molded pilasters, significant light fixtures and stone floors.

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Additionally, under the heading of "Project Characteristics," (p. 24), the SEIR discusses interior alterations proposed under the Project. The list of "interior alterations," however, fails to mention that the Project will completely destroy or substantially modify several Exceptionally Significant Interior Public Spaces, including two elevator lobbies (rooms 192, 193), South and West Reading Room (rooms 210, 211), as well as significant portions of the Main Stair Hall (loggia 290). This section should more clearly indicate the interior and exterior features of the Old Main Library, as well as any alterations to the Project site, which are entitled to special protection and which require a Certificate of Appropriateness prior to the implementation of the Project.

Lastly, under the subheading of "Physical Alterations to the Old Main Library - Seismic Alterations - Interior Alterations," the Draft SEIR again distorts the true impact of the Project on Exceptionally Significant Interior Public Spaces by speaking in generalities rather than specifics. For example, on page 35, the Draft SEIR states "[s]ome of the spaces to be

The Foundation for San Francisco's Architectural Heritage
 Comments on Draft SEIS - Asian Art Museum
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 Page 3

demolished or altered are identified as Exceptionally Significant Interior Public Spaces in the Planning Code," but fails to specifically identify those spaces by instead directing the reader to page 57 of the Draft SEIR for "more information." When the reader turns to page 57, he is again referred to another section of the Draft SEIR (Table 3, p. 63), for the "proposed disposition of those spaces as part of the Asian Art Museum project." While Table 3 accurately depicts which Exceptionally Significant Interior Public Spaces will be retained, demolished or altered under the Project, the Draft SEIR's reference to a technical table, rather than a simple written description of areas to be impacted goes against the letter and spirit of the Project Description element of an EIR. Thus, for purposes of clarity and accuracy, the Draft SEIR should state which interior features are entitled to special protection under Article 10 of the Planning Code, and of those, which are proposed to be altered or demolished under the Project. Only in that way can the reader clearly understand the impact of the Project on Exceptionally Significant Interior Public Spaces.

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 Cont.

II. The SEIR Should Be Re-Written To Explain What Physical Alterations to the Interior of the Old Main Library Are Necessary to Seismically Strengthen the Building

As part of the seismic upgrade of the Old Main Library, the Draft SEIR (pp. 4, 28) states that a base isolation foundation system must be constructed which requires the placement of shear walls inside the existing exterior walls. To accomplish this task, the Draft SEIR states that it is necessary to remove most of the interior walls, including those upon which the Piazzoni murals are located (loggia walls). This statement is not accurate. The loggia walls upon which the Piazzoni murals are mounted are "double walls." This double-wall system consists of the walls upon which the murals are mounted (which face the Monumental Staircase), which are then buttressed by a second wall located 8" behind the mural walls. Thus, it may be possible to remove the exterior wall (8" behind the mural walls) to facilitate the placement of the shear walls for seismic strengthening, while leaving the mural walls in place during demolition. See Judd Study (1997), (p. 68) for technique discussion. Thus, removal of the loggia walls (and the Piazzoni murals) is not a necessary component of seismic strengthening of the building. This section should be re-written to accurately reflect the construction and demolition measures necessary to accomplish the seismic strengthening aspect of the Project, and to take into account the fact that the Piazzoni murals do not need to be removed during the process. Moreover, the SEIR should include a section which discusses what, if any, impacts may occur to the interior loggia walls should they be left in place during seismic strengthening.

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III. The Draft SEIR Lacks a Complete Discussion of the Impact Associated with the Destruction and/or Alteration of Exceptionally Significant Interior Public Spaces and Fails to Include an Adequate Explanation for Proceedings With the Project In Light of Those Significant Impacts

CEQA requires that an SEIR identify and focus on the possible significant environmental impacts of a proposed project, with the greatest emphasis being placed on those impacts that are most significant and most likely to occur. See CEQA Guidelines § 15126(a), Pub. Res. Code § 21100(b)(1). Moreover, where there are impacts associated with the Project that cannot be alleviated without imposing an alternative design, the implications of the impact,

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as well as the reasons why the Project is being proposed, must be described. See CEQA Guidelines § 15126(b). The Draft SEIR, however, fails to include such an analysis of impacts to Exceptionally Significant Interior Public Spaces which are proposed to be destroyed or substantially altered under the Project, and fails to explain the rationale behind proceeding with the Project, rather than another design alternative, in light of those significant impacts.

First, the Draft SEIR needs to include a more accurate and detailed discussion of the historical importance of Gottardo Piazzoni and his murals, as well as the artistic impact associated with their proposed removal. It is undisputed that Piazzoni has been identified as one of America's most significant precursors of abstract painting. However, the Draft SEIR fails to discuss, or even note, this important fact. Moreover, the Draft SEIR fails to include a discussion of the historical importance of the Piazzoni murals. It is well established in the art history community¹ that these Piazzoni murals, in their present setting and configuration, represent one of the finest existing mural cycles of their period in the country. In fact, the Draft SEIR cites the opinions of two of the conservators who reviewed the Project as concluding that the Piazzoni murals "were created specifically for the Main Library and are integral to the architecture of the building, and recommend against removal of the murals from the building from the perspective of art preservation and conservation." See Draft SEIR, at p. 66, citing Rosenthal, 1996, and Silver, 1997. Conservator Rosenthal went so far as to say that "[r]emoval of the murals for reasons less than saving them from destruction would raise serious ethical questions." See Draft SEIR, at p. 66. However, the Draft SEIR fails to explain why removal of the murals is a necessary component of the Project. The Draft SEIR also fails to discuss the impacts associated with removing the murals from the place in which the artist envisioned them, and whether the integrity and value of the murals would be compromised by moving them to another location; a location which is neither disclosed nor discussed. The absence of this information renders the analysis deficient, and as such, the Draft SEIR should be revised to include this important information.

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Secondly, the Draft SEIR fails to study what impact, if any, the murals would suffer if left in place during construction activities, and is lacking an analysis of possible relocation alternatives should the murals be removed. The Draft SEIR includes a summary of the opinions of five conservators who reviewed the murals and opined on the extent of damage they would suffer if they were to be removed. Of these five conservators, three concluded that minor damage would occur to the murals even if great care was taken in the removal process. See Draft SEIR, p. 66, citing Branchick, 1997; Alkons, 1997; Huston, 1997. The other two conservators concluded that "removal would likely cause more serious damage (estimated loss of between 7 percent and 20 percent of the surface) as the canvas was pulled away from the wall." See Draft SEIR, p. 66, citing Rosenthal, 1996, Silver, 1997. In light of this potential for damage to the murals the Draft SEIR states that, "[a] preservation architect who reviewed the project on behalf of the Board of Supervisors Piazzoni Review Panel has stated that seismic strengthening of the loggia could be accomplished without removing the faux travertine panels on which the murals are mounted by installation of structural members between the panels and the exterior brick walls, which would allow the murals to remain in place," during construction. See Draft SEIR, p. 68, citing the Judd Report (1997). The Draft SEIR,

¹ The unique value of these murals have been validated by art history experts from the University of California, Berkeley, Stanford University, the Getty Museum, Harvard University, the National Museum of American Art, Princeton University, the Metropolitan Museum, and other renowned cultural institutions. However, the Draft SEIR fails to include or note in the text or the bibliography, the comments submitted by these various art history experts.

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however, ignores the conclusions of these expert conservators and the preservation architect and relies instead upon the opinion of the Asian Art Museum's own Project architect, who stated that the "murals could be damaged during construction due to vibration and exposure to the elements." See Draft SEIR, at p. 68. The Draft SEIR attempts to bolster the non-expert opinion of the Project architect by stating that the Board of Supervisors passed a resolution "urging the San Francisco Art Commission to remove the Piazzoni murals from the old Main Library prior to the start of construction on the Asian Art Museum."² See Draft SEIR, at p. 68. This Resolution, however, was merely a recommendation and should have no binding effect upon the conclusions reached in the Draft SEIR. In fact, the Resolution specifically conditioned its recommendation for removal of the murals upon prior exploration of options for the possible relocation and public display of the murals and "subject to conducting any required environmental review and securing any required permits." See Exhibit "A," for a true and correct copy of the Resolution; see also Draft SEIR, at p. 68. The Draft SEIR contains no such analysis and lacks a discussion of why the Project requires the removal of the Piazzoni's in light of the unmitigatable significant impacts. As such, the Foundation believes this section is not legally adequate for purposes of approving the Project, and that prior to a decision to remove the Piazzoni murals, a thorough study of potential impacts to the murals if left in place during construction activities should be conducted, as well as a complete analysis of possible relocation alternatives.

Thirdly, the Draft SEIR fails to adequately analyze the impacts of the Project on the Library's designation as Contributory Building to the Civic Center Historic District. For example, the Project proposes to demolish Public Corridor 290 (where the 14 Piazzoni murals are located), which the Draft SEIR states are "distinctive features and examples of craftsmanship which contribute to the significance of the building."³ However, despite this finding, the Draft SEIR states in the subsection entitled "Impact Assessment," that "while they [the changes to the interior] would significantly alter the building, it is unlikely that these changes would render the old Main Library building no longer contributory to the districts, or substantially diminish the existing character of the districts." See Draft SEIR, page 59. On the basis of this perfunctory "impact assessment," the Draft SEIR concludes that the "project effects on the historic districts would not be considered significant." See Draft SEIR, page 71. This conclusion and analysis is woefully insufficient given the magnitude of changes being proposed by the Project to Exceptionally Significant Interior Public Spaces. A detailed analysis should be included which explains why the Project requires the demolition of the ground-floor elevator lobbies, the walls of the second-floor loggia, removal of the Piazzoni murals, demolition of the north wall of the Fulton Street reading room, and demolition of the north and south portions of the east wall of the Larkin Street reading room (all of which are defined in the Planning Code as Exceptionally Significant Interior Public Spaces). See Draft SEIR, pages 70-71. In the absence of such an analysis, readers and agencies with permit authority over the Project, such as the Landmarks Preservation Board, are deprived of information necessary for them to accurately assess whether the Project will "adversely affect the special character or special historical, architectural or aesthetic interest or value" of the Old Main Library. As such, the Foundation for San Francisco's Architectural Heritage believes that further environmental analysis is required prior to approval and certification of the Draft SEIR by the Commission.

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² It should be noted that the Resolution was directed to the San Francisco *Asian* Art Commission, and not the San Francisco Art Commission. This typographical error should be remedied in the Draft SEIR.

³ See Draft SEIS, at p. 66, citing Page and Turnbull, 1998, at p. 13.

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IV. The Proposed Mitigation Measures for the Removal and Relocation of the Piazzoni Murals is Inadequate.

As discussed in Section III, above, the Foundation for San Francisco's Architectural Heritage believes the Draft SEIR analysis with respect to the need for removal of the Piazzoni murals, as well as the impacts on the status of the Old Main Library as a Contributory Building in the Civic Center Historical District as a result of the destruction or alteration of Exceptionally Significant Interior Public Spaces, is inadequate, and on that basis, believes that Chapter IV of the Draft SEIS, entitled "Mitigation Measures Proposed to Minimize Potential Significant Impacts of the Project," is also inadequate. In particular, the Foundation wishes to draw the Planning Commission's attention to the subheading "Historic Architectural Resources," (pp. 84-86). As part of the mitigation measures proposed for the Project, the Draft SEIR proposes to commission the preparation of a complete Historical Structures Report, by a qualified preservation architect. Such an analysis should occur prior to the approval and certification of the SEIS, and its conclusions incorporated into the SEIR so that the efficacy of the proposed mitigation measures for the destruction and alteration of Exceptionally Significant Interior Public Spaces can be fully assessed and analyzed by readers.

Additionally, the Mitigation section of the Draft SEIR makes several erroneous statements regarding the removal of the Piazzoni murals. First, the Draft SEIR once again infers that the resolution of the Board of Supervisor's is binding and determinative on the issue of whether the Piazzoni murals should be removed. *See* Draft SEIR, at p. 86. As discussed above in Section III, the resolution of the Board of Supervisor's was only a recommendation "urging" the removal of the murals, and is in no way binding on the ultimate determination of the Draft SEIR on the propriety of such removal. Secondly, the Draft SEIR states that as mitigation for the removal of the Piazzoni murals, "[t]he Asian Art Foundation has allocated \$250,000 towards restoration of the Piazzoni murals once they are removed." *See* Draft SEIR, at p. 86. As a preliminary matter, the Foundation has consulted with a certified conservation specialist who has determined that the amount allocated is woefully insufficient to properly restore and repair the murals once they are removed. Moreover, unlike the other historic materials proposed to be removed from the Old Main Library,⁴ the Draft SEIR makes no mitigation commitments to find a new permanent location for the Piazzoni murals. The importance of finding a suitable relocation site for the Piazzoni murals is heightened by the fact that they (unlike the other historical features proposed for relocation) have been designated as part of an Exceptionally Significant Interior Public Space. As such, the failure of the Draft SEIR to address this issue is a fatal flaw which must be remedied prior to its certification as legally adequate.

Lastly, the Draft SEIR provides no significant or legally adequate discussion of why retention of the murals and/or the covering the murals (mitigation measures that were considered in the 1992 FEIR), are no longer feasible mitigation measures. *See* Draft SEIR, at p. 86. The only discussion on this point is found at page 68, in which it is stated that "[i]f the Piazzoni paintings remained in place, the design [Project] itself would be compromised. Such a self-serving statement is not an adequate explanation for removal of the murals in light of the availability of other feasible design alternatives and mitigation measures.

⁴ The Draft SEIR proposes as mitigation measures the relocation of the two duMond murals, the Lentielli sculptures, the bust of Edward Robeson Taylor and the Old Main Library plaque. *See* Draft SEIR, at p. 85.

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V. The Rationale for Rejecting Alternative B (Full Preservation Alternative) and Alternative C (Reduced Impact on Historic Architectural Resources) is Not Supported By Substantial Evidence in the Record.

As correctly stated in the introduction section to Chapter VI of the Draft SEIR, the "Project decision-makers must select an environmentally superior alternative unless that alternative is found to be infeasible on the basis of substantial evidence in the record." Draft SEIR, at p. 97 (emphasis added). The Draft SEIR analyzes an alternative entitled "The Full Preservation Alternative" ("Alternative B"), which was "developed by a preservation architect using a conservative approach that maximizes the retention of historic building fabric and associated qualities of the historic resource." *Id.* The Draft SEIR also analyzes an alternative entitled "Reduced Impact on Historic Architectural Resources" ("Alternative C"), which would include some of the interior changes proposed by the Project, but would avoid substantial alterations to most of the Exceptionally Significant Interior Public Spaces. *See* Draft SEIR, page 107. The Foundation believes that both Alternative B and Alternative C were inappropriately rejected in the Draft SEIR as infeasible.

With respect to Alternative B, the Draft SEIR rejects the alternative on the basis that it would provide substantially less permanent and temporary gallery space than presently provided by the existing Asian Art Museum in Golden Gate Park. *See* Draft SEIR, page 107. This statement is not supported by substantial evidence in light of the fact that the Draft SEIR also states, under the Project description section, that the use of the Old Main Library by the Asian Art Museum would increase the total usable program space from the Golden Gate Park location by approximately 65%, from 73,000 sq. ft. to 121,500 sq. ft. *See* Draft SEIR, page 24. The inference drawn from the Draft SEIR is that much of the total usable program space provided by the Old Main Library under Alternative B cannot be used as exhibit space because without major modification to the interior, the building "would not meet circulation or orientation objectives of the sponsor." *See* Draft SEIR, page 107. The "program objective," as set forth at page 18 of the Draft SEIR, "of relating the path of travel to the origin and spread of Buddhism" is not viable a reason for rejecting Alternative B, nor is the project objective of "transforming dark, static areas ... into dynamic, light filled spaces full of movement." *See* Draft SEIR, page 107. Moreover, the assertion that under Alternative B, the Great Hall could not be used as a lecture hall is irrelevant, as the second phase expansion (analyzed in the FEIR), includes the construction of a 400-seat auditorium with 4,000 sq. ft. of service space and 16,500 sq. ft. of museum office space at 45 Hyde Street. *See* Draft SEIR, at p. 43. When evaluating projects under CEQA, the Project must be considered as a whole, and may not be segmented to avoid finding significant impacts. Lastly, the statement that "it is not clear that this alternative [B] would be in full compliance with the Secretary of Interior's *Standards for Rehabilitation*" is misleading in that it has the effect of suggesting to the reader that none of the alternatives analyzed, (with the exception of the "No Project Alternative"), would meet the Secretary's Standards, and as such, the Project is just as good as any of the other alternatives considered. As such, this statement should be stricken. Thus, there is a lack of evidence in the record to support the rejection of Alternative B, which would maximize the retention of the Old Main Library's historic fabric and qualities, as required by CEQA.

With respect to the Draft SEIR's rejection of Alternative C, the Foundation for San Francisco's Architectural Heritage believes the rejection of this alternative as infeasible is not supported by substantial evidence in the record for many of the same reasons expressed above, for Alternative B, and as such, incorporates its comments with respect to Alternative B by

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references. In addition, however, the Foundation believes that the nature of the proposed "true mezzanine and/or self-contained two-story structure within the second floor reading rooms," proposed by Alternative C should be more fully explained, perhaps with proposed floor-plans, so that the reader can more accurately envision this proposal. *See* Draft SEIR, page 107. In conclusion, the Foundation believes that the plans for Alternative C are vague and that the Draft SEIR fails to include an adequate explanation of why Alternative C fails to accomplish "the program objective of relating the path of travel to the origin and spread of Buddhism," and why it "would preclude future expansion necessary for the long term viability of the museum. Draft SEIR, page 109. As such, there is a lack of evidence in the record to support the rejection of this alternative as infeasible.

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The Foundation for San Francisco's Architectural Heritage is grateful for the opportunity to submit these comments and hopes the Planning Commission finds these comments useful in its evaluation of the adequacy of the Draft SEIR. The undersigned and/or representatives of the Foundation will be available at the Planning Commission's scheduled August 20th hearing to answer any questions the Commission, or its staff, might have regarding the foregoing. Thank you for this opportunity to present the Foundation's comments.

Sincerely,



Kelly L. Drumm

Counsel for The Foundation for San Francisco's
Architectural Heritage

encl.

LETTER J – FOUNDATION FOR SAN FRANCISCO'S ARCHITECTURAL HERITAGE

- J-1) The SEIR provides an adequate, accurate, and objective discussion of the impacts of the project. The following responses address individual points made by the commenter.

The commenter references a wide-ranging number of CEQA and CEQA Guidelines sections, including CEQA Section 21002, Approval of Project. However, the comments do not provide evidence that supports a conclusion that the SEIR does not comply with the statute or Guidelines. For example, the commenter has provided only a partial explanation of the directive of CEQA. CEQA Section 21002 states, in general, that it is state policy that a project not be approved if there are feasible alternatives or feasible mitigation measures that would substantially lessen the project's significant effects, and that a project may be approved, significant effects notwithstanding, "in the event specific economic, social, or other considerations make infeasible such project alternatives or such mitigation measures." This passage in quotation marks provides for a statement of overriding considerations, which allows a lead agency to balance a project's potential benefits and impacts and, if the agency finds that the benefits outweigh the impacts, approve the project even if there would be significant effects (CEQA Guidelines Sec. 15093). Clearly, in the case of the proposed Asian Art Museum project, for which the SEIR identifies significant unavoidable adverse effects on historic architectural resources, the project cannot be approved in the absence of such a Statement of Overriding Considerations. Contrary to the commenter's more specific assertion, the SEIR provides an adequate, accurate, and objective discussion of the impacts of the project, including projects on Exceptionally Significant Interior Spaces. This comment, which is repeated, is addressed in more detail below.

- J-2) Please see the responses to Comments J-3 through J-7, below.

- J-3) Regarding the commenter's assertion that the Project Description in the DSEIR "does not adequately describe the impact of the Project on Exceptionally Significant Interior Spaces," the commenter appears to be confusing the description of the proposed project (Chapter II) with the evaluation of impacts (Chapter III). As stated in the response to Comment F-1, p. C&R.46, Section 15124 of the State CEQA Guidelines states, The project description "should not supply excessive detail beyond that needed for evaluation and review of the environmental impact." Chapter II provides all the information required by Section 15124. This CEQA Guidelines section requires a "statement of the objectives sought by the proposed project," which the SEIR provides on pp. 19-21. The commenter states that some portion of these project objectives, supplied by the project sponsor, "distorts the impacts of the project." The project objectives represent the sponsor's intentions for the project: in fact, portions of the objectives text are directly quoted from the Asian Art Museum Master Plan and the project architect. The sponsor's objectives were not used in the evaluation of project impacts, which is based on the proposed physical changes to the old Main Library building, not their rationale.

Regarding those physical changes, the SEIR authors note the commenter's apparent confusion, in particular regarding the project description, including changes to Exceptionally Significant Interior Spaces, specifically, the commenter's assertion that the description is not complete. Project Characteristics, SEIR p. 24, provides an introductory overview of the project description, and then the project description is given in detail. For example, the specific changes cited by the commenter (the project would "destroy or substantially modify several Exceptionally Significant Interior Spaces, including two elevator lobbies (rooms 192, 193), South and West Reading Rooms (Rooms 210, [201]), as well as significant portions of the Main Stair Hall (loggia 290)") are described in the SEIR in the text, in tabular format, and in graphic depiction. The text states the project would result in "addition of a new third floor throughout the entire building. This level would consist of gallery space through the north, west and south wings of the museum, including installation of a new floor level in the existing two-story reading rooms on the west and south sides of the old Main Library building (the former History and Literature departments, respectively)" [fourth bullet, SEIR p. 36]; "demolition of parts of the existing east walls of the Larkin Street reading room (Room 201) on the second floor to incorporate into this room existing corridors (Rooms 291B and 291C) north and south of the loggia, at the second floor only" [first bullet, p. 40]; and "removal of existing Gottardo Piazzoni murals on the walls of the second floor stair loggia" [eighth bullet, p. 40]. These same changes are presented in Table 2, p. 27, which also states that the project would "demolish" elevator lobbies 192 and 193 and the walls of stair loggia 290. Finally, the changes are also depicted in Figures 6 and 7, pp. 37 and 38. The SEIR does not present a curtailed or distorted project description, as implied by the comment.

As to the impacts of these changes, they are presented in detail in the Impacts analysis on pp. 62, 65, 66, 68, and 69, and in Table 3, pp. 63-64, which attempts to concisely summarize all project effects on historic architectural interior spaces. (The commenter's dismissal of the table as a "technical table" that somehow conveys less useful information than "a simple written description" seems somewhat disingenuous. The commenter herself notes that "Table 3 accurately depicts which Exceptionally Significant Interior Public Spaces will be retained, demolished or altered under the Project.")

Regarding the interior features protected under Article 10 of the Planning Code, and the disposition of those features under the project, Table 3 identifies each such feature with a check mark (✓), and identifies the disposition in the right-hand column. Again, this information is also presented in text form for each Article 10 space. The commenter's implication that the reader must turn back and forth in the text is unfounded. The project description, SEIR p. 35, describes the interior alterations proposed with the project and refers the reader to p. 57 for clarification of terms such as Exceptionally Significant. Page 57 explains the historic resource surveys done on the building and their nomenclature. Page 57, in turn, refers to the disposition of these components of the historic resource, information which properly belongs under Impacts.

- J-4) The commenter confuses the project's proposed installation of concrete shear walls with the project's proposed treatment of the second floor stair loggia; the two components are only

related in so far as the shear wall installation would affect the east wall of the loggia. As stated on SEIR p. 28, shear walls "would be constructed essentially as concrete tubes at the four corners of the building and at the Great Hall." No shear walls would be constructed in the portion of the old Main Library building containing the Monumental Staircase or the north, south, or west walls of the loggia. At the four corners of the building, the sponsor proposes to construct the shear walls inside of, and thus without disturbing, the existing principal exterior granite facade walls; this would "necessitate removing interior walls" at these locations, as stated on p. 28. In contrast, at the Great Hall, to preserve the *interior* walls, the sponsor proposes to remove the exterior glazed masonry (brick) walls and install the shear walls outside the interior walls. As stated on SEIR p. 60, this methodology, while preserving the interior walls of the Great Hall, would require removal of the east wall of the second floor stair loggia, because this wall is shared with the west wall of the Great Hall. As this wall supports two of the Piazzoni murals ("The Mountain" and "The Forest"), the sponsor's proposed scheme would require the removal of these two murals.

Separate from the installation of shear walls, the project sponsor proposes to remove the other 12 Piazzoni murals and the wall panels on which they are mounted from the north and south walls of the stair loggia, and to install new structural columns in the loggia walls, as part of the proposal to create a new Central Court inside the main Larkin Street entrance and to structurally strengthen this portion of the building (see SEIR p. 36). As noted on SEIR p. 68, an independent preservation architect has proposed an alternative scheme for seismic strengthening of the loggia (not a part of the shear wall scheme under either the project or this alternative approach) without removal of the interior walls, including the Piazzoni murals. This is discussed further in the response to Comment F-10, p. C&R.54. That response also discusses effects on the loggia walls (Piazzoni murals) should they be retained in place during seismic upgrading.

To clarify the project sponsor's approach to shear walls, the second sentence of the second paragraph following the numbered list on SEIR p. 28 is revised as follows (new language is underlined):

The shear walls would be constructed inside the existing exterior walls, which, to avoid affecting these outside walls, would necessitate removing interior walls, except at the Great Hall, where the shear walls would be constructed around the outside, within the existing interior light courts and at the eastern exterior facade, to preserve the Great Hall's interior plaster and other finish materials.

- J-5) The SEIR complies with CEQA and the CEQA Guidelines, including CEQA Section 21100(b)(1) and Guidelines Sections 15126(a) and (b).⁵ The SEIR identifies and focuses on the significant environmental impacts of the proposed project (Sec. 15126.2(a)): changes to the Exceptionally Significant Interior Spaces designated by Article 10 and the exterior changes to the building, those impacts that are most significant and most likely to occur. As noted, these changes are described in overview (Project Characteristics), and in text, table, and graphics in the

⁵ Now Secs. 15126.2(a) and (b) in the newly revised Guidelines (October 26, 1998).

Impacts discussion of SEIR Section III.A. New graphics have been added to the SEIR in the text and in Appendix A to further aid the reader's understanding of these proposed changes. Mitigation measures (SEIR Chapter IV) and Alternatives (SEIR Chapter VI) are provided, as required by Guidelines Sections 15126.4 and 15126.6 (formerly Secs. 15126(c) and (d)) that would avoid or reduce these impacts, all in accordance with CEQA and the Guidelines.

Regarding the Piazzoni murals comments, the SEIR states on p. 66, "Removal of the Piazzoni murals would displace from the old Main Library building works of art that, in the view of several experts, are considered integral to the building," and reports the opinion of two conservators who inspected the murals (cited by the commenter) that the murals were created specifically for the Main Library and are integral to the architecture of the building.

The commenter notes that art history experts from a number of prominent institutions have opined against removal of the Piazzoni murals, citing the site-specific nature of the work; the artist's reputation as a leader in the tonalist painting movement and his influence on other artists; the murals' specific designation under Planning Code Article 10 as integral to the Stair Loggia, an Exceptionally Significant Interior Space; and the damage that the murals could sustain were they to be removed from the loggia walls. Other points made by opponents of removing the murals include the Asian Art Museum's alleged disregard for the murals as important works of art over which a museum is obligated to provide appropriate custody, and the notion that the murals, rather than conflicting with a collection of Asian Art, could serve as an effective transitional element between the western Beaux Arts design of the old Main Library building and the eastern collection of the Asian Art Museum. For clarification of the record, the SEIR authors did not cite from the collected correspondence in opposition to removing the murals, provided by the Committee to Retain the Piazzoni Murals, because the authors believed that the reports of the five conservators selected to evaluate the murals in 1996 and 1997, along with material provided by the independent preservation architect who reviewed the project on behalf of the Board of Supervisors' Piazzoni Review Panel and an art historian specializing in murals in the United States, could adequately represent the range of professional opinion concerning the disposition of the Piazzoni murals. On this issue, perhaps more than any other concerning the Asian Art Museum's proposed move to the old Main Library building, there is disagreement among both experts and lay observers alike. The SEIR authors have attempted to accurately portray the nature of this disagreement. It will be for the decision-makers to resolve the question. In deciding whether or not to approve the project, the decision-makers will consider the information in the SEIR, along with the Main Library/Asian Art Museum FEIR, the FEIR Addendum, and other information in the record, including, but not limited to, the project sponsor's application for a Certificate of Appropriateness and the information presented by the Committee to Retain the Piazzoni Murals, the commenter, and other opponents of removing the murals.

Regarding the project sponsor's reasons for proposing removal of the murals, the SEIR includes a statement from the Asian Art Museum on p. 68, explaining why in its view removal of murals is integral to the design program. It would be more appropriate for the project sponsor, during

the approval process, to explain in greater detail why removal of the murals is a necessary component of the Project. Please see also the response to Comment F-6, p. C&R.50, concerning Gottardo Piazzoni, his career, and his murals in the old Main Library building.

The SEIR does not ignore the conclusion of expert conservators and the independent preservation architect or rely on the opinion of the project architect. The SEIR reports both sides, as the commenter's own references to the SEIR show. While the SEIR acknowledges the project architect's opinion that the murals could be damaged if left in place, the SEIR also notes a similar opinion expressed by an art conservator selected by the Asian Art Museum to serve on the Board of Supervisors' review panel (Huston, 1997), who has stated that the murals should be removed to protect them during construction (see the response to Comment F-10, p. C&R.54), and the SEIR further provides a differing opinion from two conservators who recommended that the museum alter its design scheme to retain the murals in place, and stated that the murals could be preserved in place during construction by enclosing the murals in solid, climate-controlled boxes (see SEIR p. 66). Finally, the SEIR (p. 68) presents a similar argument from the independent preservation architect noted by the commenter. This issue, like the question of the murals' ultimate disposition, has generated differing opinions among experts, and the SEIR presents the range of opinion expressed by experts who reviewed the question. The SEIR finds that the project would have a significant, unavoidable effect in regard to historic architectural resources based, in part, on the proposed removal of the Piazzoni murals.

The Board of Supervisors' resolution noted by the commenter was referenced in the SEIR for the reader's information; it did not affect the SEIR's conclusion, on p. 70, that removal of the Piazzoni murals would contribute to the project's significant effect on historic architectural resources. See also the response to Comment J-6, below, regarding this Board resolution. (As noted in the response to Comment G-1, p. C&R.63, the SEIR has been revised to correct the reference to the *Asian* Art Commission, rather than the San Francisco Art Commission.) As noted on SEIR p. 68, no definitive relocation site has been identified for the Piazzoni murals. The Asian Art Museum would explore options for their relocation, as stated in the first mitigation measure on SEIR p. 86. It is not necessary for the relocation site to be identified in the SEIR, which already identifies a significant impact on historic architectural resources, and presents two alternatives that would avoid the impact on the murals.

The conclusions cited by the commenter with regard to effects on the historic districts are the summary statements that appear both at the beginning and the end of the SEIR's impact assessment: these statements are based on the entirety of the analysis of effects on historic architectural resources, which does provide 14 pages of "detailed analysis" of the physical alterations proposed as part of the project (SEIR pp. 59-72). As stated in the response to Comment A-4, p. C&R.14, based on comments from the National Park Service (NPS) and the State Historic Preservation Officer (SHPO), the SEIR has been revised to include their opinions that the significant, unavoidable adverse effect on historic architectural resources (the old Main Library building) would encompass effects on the National Register-listed and local historic districts as well.

While the NPS and SHPO have submitted comments on the DSEIR that go beyond their September 1997 comments on the project, and the DSEIR is revised herein to reflect their opinions, it should be noted that the SEIR description and disclosure of physical effects of the project remains current and valid. That is, regardless of the building's status as a contributor in the National Register historic districts due to the proposed changes, those actual physical changes are accurately described in the SEIR. Please see also the response to Comment A-4, p. 14, for additional discussion of effects on the historic districts.

- J-6) Regarding the Historic Structure Report (HSR), as stated in the response to Comment B-6, at the time the DSEIR was published, the Historic Structure Report, by Page & Turnbull, preservation architects, was under way but was not complete. The HSR was published in August 1998. It does not change the conclusions of the SEIR.

Regarding the Board of Supervisors' resolution, the SEIR neither states nor infers that this resolution is binding. The resolution is described on SEIR p. 68 as "urging" the removal of the murals. The actual wording of Resolution No. 1144-97 is:

RESOLVED, That the Board of Supervisors urges the Asian Art Commission to remove the Piazzoni paintings from the walls of the Old Main Library before major construction work is begun in order to protect and preserve them; and be it further

RESOLVED, That the Board of Supervisors urges the Asian Art Commission to explore options for the possible relocation and public display of the Piazzoni paintings subject to conducting any required environmental review and securing any required permits.

The resolution passed on a vote of 9-2, on December 15, 1997, and signed by the Mayor on December 23, 1997.

There is no fatal flaw, as the commenter asserts, in the mitigation measures. The SEIR identifies the mitigation measures and their status, noting at the beginning of the Historic Architectural Resources mitigation measures section on p. 84 that the measures "would reduce but not eliminate significant adverse effects on Historic Architectural Resources." That is, these are partial mitigation measures. However, Alternative C would reduce, and Alternative B would eliminate the significant adverse impacts of the project on historic architectural resources.

Regarding the mitigation measure noted by the commenter, the measure is specifically worded to be consistent with the Supervisors' resolution, stating that the museum would "explore options for the relocation and public display of the Piazzoni murals." Regarding the funds allocated for the relocation, please see the response to Comment B-8, p. C&R.27.

The previously identified mitigation measures – retention and/or covering in place of the Piazzoni murals – are listed on p. 86 of the SEIR under the heading, "Measures From The 1992

FEIR That Are No Longer Feasible Or Address Impacts That Would Be Eliminated By New Alternatives.” The first measure under this heading, imposition by the Board of Supervisors of a condition on the jurisdictional transfer of the old Main Library building, requiring that the remodeling program for building the complies with the Secretary of the Interior’s *Standards for Rehabilitation*, is no longer feasible, in that the building has already passed to the jurisdiction of the Asian Art Commission without such a condition. The next three measures would all be subsumed under SEIR Alternative B, Full Preservation Alternative. As stated previously, the decision-makers could require that certain components of the alternatives be incorporated into the project, as long as those components were adequately analyzed in the Main Library/Asian Art Museum FEIR and the SEIR.

- J-7) The SEIR provides information from the project sponsor on the sponsor’s reasons for rejecting both Alternative B and Alternative C. It is not the function of the SEIR to accept or reject alternatives. It will be for the decision-makers, acting on the whole of the record – including the SEIR, the Main Library/Asian Art Museum Final EIR, and information presented by the project sponsor as well as project opponents – to determine whether to grant approval for the project, including the Certificate of Appropriateness, parking variance, and other required approvals listed on SEIR pp. 44-45. The project sponsor (and others) will have the opportunity to present additional, more detailed information to the decision-makers during their consideration of project approval.

Regarding the description of Alternative C, as stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, Figures 16, 17, 18, and 19, pp. 109a-109d, depicting Alternative C, Reduced Impact on Historic Architectural Resources, have been added to the SEIR.

REFERENCE – LETTER J

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Huston, Perry C., art conservator, “Piazzoni Murals Review Panel Report.” This report was prepared in response to the Board of Supervisors’ creation of a Piazzoni Murals Review Panel. Mr. Huston was selected for the panel by the Asian Art Museum. 1997

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**CALIFORNIA HERITAGE COUNCIL**

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TO SAVE OUR SIGNIFICANT BUILDINGS AND SITES

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August 20, 1998



Planning Commission
City and County of San Francisco
c/o San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

Subject: Old Main Library
Asian Arts Museum
Draft Supplemental EIR

Ladies and Gentlemen of the Commission:

This letter will present the comments of the California Heritage Council regarding the above subject at your meeting later today at the temporary City Hall at 401 Van Ness Avenue. We will make general comments first, and follow them with specific comments and page references.

We feel that the proposed changes to the old Main Library building, either as described in Alternative B or Alternative C, are so massive that neither alternative should be approved from a historic preservation point of view. While Alternative B appears to be less harmful to the historic features of the building than Alternative C, neither of these alternatives appears to comply with the Secretary of the Interior's "Standards for Rehabilitation of Historic Properties."

For this reason, adoption of either Alt. B or Alt. C reasonably could result in the building's removal from the National Register of Historic Places. The changes that would be made under those alternatives also do not comply with the City's own design criteria, as will be discussed later.

The draft SEIR indicates that the project sponsor desires additional changes in the building that are not mentioned in the draft SEIR, and are beyond the details outlined in Alt.'s B and C. We infer this from statements made on pages 107 and 109 that the project sponsor has rejected both of these alternatives.

Other statements made in the SEIR in reference to the project sponsor give the impression that the project sponsor is unyielding and unwilling to compromise. To us, this apparent attitude on the part of the project sponsor clearly indicates that the Asian Arts Museum should have its own building, completely new from the foundation up, and on property owned by them, so that

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Planning Commission, City and County of San Francisco
 c/o San Francisco Planning Department
 August 20, 1998
 Page Two

every element of their new building will be harmonious with their overall design intent. As matters stand now, the old Main Library building will continue to be a Beaux Arts building (despite the massive planned changes), and there will be permanent disharmony between the old building and the planned internal/external changes, as well as with the planned additions along Fulton and McAllister Streets.

For these reasons (and other reasons discussed later in this letter), the California Heritage Council asks that you:

1. Not issue a Certificate of Appropriateness for this project, and
2. That you recommend adoption of Alternative A, "No Project."

Our recommendation of adopting Alt. A does not mean that the California Heritage Council opposes a new Asian Arts Museum. We only ask that the old Main Library building not be used for it. We also point out that the new Main Library management is already complaining that they don't have enough space. The logical thing, of course, would be to re-use the old Main Library building (just across Fulton Street from the new Main Library building) as an auxiliary library.

We also point out that about one-half of the money to build the old Main Library building (about 1914) was provided by Andrew Carnegie, the other half being paid by San Francisco taxpayers. The plaques and inscriptions on the building make it clear that the building was built for the edification and enlightenment of all concerning the knowledge and wisdom of the ages, being conveyed by literature. To have this building converted to use by one segment of the population as a museum honoring their ethnic culture is not at all in keeping with the reasons that Carnegie and San Francisco taxpayers of his time built the building.

In four places (pages 18, 21, 99 and 109) statements are made to the effect that the building's circulation pattern and internal design are being changed to reflect the origin and spread of Buddhism. We feel that it is inappropriate to expend public money on a public building, or elsewhere, to highlight or otherwise glorify any religion.

Comments on specific page numbers:

Page 31: The central doorway on the Fulton Street side should be returned to service. It is a ceremonial doorway, with steps and a lintel overhead, and new ornamental lights are shown flanking the stairway from the public sidewalk. The new lights should be associated with an operable door, in our opinion. The internal arrangement opposite these ornate double-doors should be changed to permit reuse of this very fine and centrally-located entrance way. Also, we note that the four new doors shown on the drawing are unsymmetrically placed.

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Planning Commission, City and County of San Francisco
 c/o San Francisco Planning Department
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 Page Three

Page 21: "No Federal funding is included in this project" (statement in small print at the bottom). We are informed by knowledgeable persons that Federal funding would be available for seismic retrofitting of this building if historic preservation criteria were adhered to in the proposed modifications. However, the project sponsor evidently has insisted upon changes that would damage the historic elements of the building to the extent that the building would be ineligible for FEMA funding. Thus, San Francisco taxpayers are being asked to pay for seismic retrofitting measures when that work could be paid for by the Federal government if the project sponsor were not insisting upon changes that would unacceptably damage the building's historic character.

3

Page 46: Urban Design element of the San Francisco General Plan: Policies #5 and #6 of Objective #2 are being violated by this project; particularly Policy #5, which states: "to use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings."

4

Pages 48 and 71: Draft Civic Center Plan: Policy #4 of Objective #3333 is being violated, since both the State Office of Historic Preservation and the National Park Service have stated that the proposed changes do not meet the Secretary of the Interior's "Standards for Rehabilitation of Historic Properties."

Pages 63 and 64: Most of the historic architectural items that were rated Contributory, Significant or Very Significant by Carey & Co. (a well-known and highly respected local historic preservation consultant) are slated for demolition under the project sponsor's plans.

5

Page 86: The suggestion seems to be made that the Board of Supervisors could elect to transfer jurisdiction over the old Main Library building to the Asian Arts Museum. Just what legal effect this would have is not clear, but it would appear to lessen the control of the Planning Commission over future changes that the Asian Arts Museum may decide to make in the building.

6

Page 73: "Window changes" should be added to the list of changes under "Impact Assessment."

7

Page 97: The "Full Preservation Alternative" (which is Alt. B) would reduce, but not eliminate (as stated) the significant impact on historical resources. The "Reduced Impact Alternative" (which is Alt. C) would reduce the impact on historical resources less than would Alt. B.

8

Pages 16 and 107: Alternative C should be retitled "Reduced Preservation Alternative" (for easy comparison with Alternative B) so that it is clear that Alternative C is less kind to historic preservation than Alternative B.

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Page Four

We note that the SEIR does not mention anything about who pays for the operating and maintenance expenses of the building when it would come under the management of the Asian Arts Museum, whether the AAM would pay any rent to the City for the use of this facility, and how long the AAM would be obligated to remain in the building. While these questions are not within the purview of the SEIR, taxpayers who would have to foot the bill for work on the building, plus prospectively having it changed so that it might be difficult for another organization to move in at some future time, might be interested in answers to these questions.

9

We reiterate our above recommendations:

1. That you do not issue a Certificate of Appropriateness for this project, and
2. That you recommend that Alternative A (as described in the SEIR) be adopted. If that is not feasible, we would reluctantly go along with Alternative B.

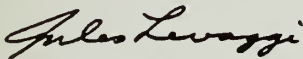
To these recommendations (made earlier in this letter) we would add:

3. That under no circumstances should Alternative C, or the project sponsor's original plans (not detailed in the SEIR), be adopted.
4. That discussions be initiated with the project sponsor so that damage to historic resources can be reduced to the extent that Federal money would be available for seismic retrofitting work. San Francisco taxpayers would appreciate that.

10

Sincerely yours,

CALIFORNIA HERITAGE COUNCIL



Jules Levaggi
President



Winchell T. Hayward
Vice President
Chairman, Old Main Library Committee

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Gerald Adams, San Francisco Examiner

LETTER K – CALIFORNIA HERITAGE COUNCIL

- K-1) The commenters' opposition to the Alternatives B and C is noted. It should be noted that both the National Park Service (see Comment Letter A) and the State Office of Historic Preservation (see Comment Letter B) have expressed the opinion that both Alternatives B and C would or could comply with the Secretary of the Interior's *Standards*. The meaning of the commenters' statement regarding "additional changes in the building that are not mentioned in the draft SEIR, and are beyond the details outlined in Alt.'s B and C" is unclear: certainly, the project as proposed would result in more substantial effects on historic architectural resources, but there are no substantive changes proposed that are not identified in the SEIR.

The commenters' support for Alternative A, the No Project Alternative, their opposition to issuance of a Certificate of Appropriateness and use of the old Main Library building for the Asian Art Museum, and the comment regarding expending money to highlight a particular religion are noted. It should also be noted that the Asian Art Museum is not intended to be a museum only for Asians ("use by one segment of the population as a museum honoring their ethnic culture"), but rather to display the arts of Asia for interested persons of all backgrounds. The museum's intent is not to "glorify" a particular religion, but to use the spread of Buddhism as a means of guiding a visitor's path through the museum. As stated on p. 21 of the SEIR, "a key objective of the proposed circulation pattern is to relate the path of travel through the old Main Library building to the origin and spread of Buddhism (both geographically and chronologically) in that Buddhism is a common thread throughout Asia and Asian Art."

Regarding the reuse of the old Main Library building as an auxiliary library, the comment is noted. As discussed further below in the response to Comment K-6, that the building has already been transferred to the jurisdiction of the Asian Art Commission, and in 1994, San Francisco voters voted to use the building for the Asian Art Museum.

- K-2) As stated on SEIR p. 42, the existing secondary entrance on Fulton Street was not used by the Main Library in recent years. Therefore, the Asian Art Museum's proposal to fix shut this doorway would not represent a change from existing conditions. The Fulton Street entrance would remain, and could be reopened in the future.

Regarding the proposed new doorways on the Fulton Street facade, the preservation architect's Preliminary Assessment (see SEIR Appendix A) notes that provision of two emergency exit doors on Fulton Street appears to comply with the Secretary of the Interior's *Guidelines for Rehabilitating Historic Buildings* because, with this additional health and safety feature, "the windows as a collective element in the exterior will be preserved" (Page & Turnbull, 1998, p. 2). Creation of two additional doors to serve the cafe and dining terrace, however, would not comply with the *Guidelines'* direction to install additional entrances on secondary, non-character-defining facades, according to the Preliminary Assessment (Page & Turnbull, 1998, p. 3).

- K-3) According to the project sponsor, the Federal Emergency Management Agency (FEMA) provided approximately \$450,000 for repairs to the old Main Library building following the 1989 Loma Prieta earthquake, while the building was still in use as the Main Library. No federal funding has been applied for in the current project, conversion of the building to the Asian Art Museum. It should be noted that approximately \$42 million in construction funds would come from a voter-approved bond issue for the Asian Art Museum project, while the remainder of the \$123 million construction cost is to be raised privately by the museum. (An additional \$9.4 million in bonds was approved in 1989 for earthquake repair of the then-Main Library.)
- K-4) The General Plan contains many policies, which may address different goals. The Planning Commission, in deciding whether to approve the Certificate of Appropriateness, must decide whether, on balance, the project is consistent with the General Plan. It should be noted that the SEIR identifies a significant, unavoidable adverse effect on historic architectural resources as a result of proposed alterations of the old Main Library building.

Regarding the draft Civic Center Plan, the comment is noted. For the reader's information, this area plan has not yet been adopted as part of the San Francisco General Plan.

- K-5) The comment is noted. As stated in the prior response, the SEIR identifies a significant, unavoidable adverse effect on historic architectural resources.
- K-6) The first mitigation measure on p. 86 of the SEIR under the heading, "Measures From The 1992 FEIR That Are No Longer Feasible Or Address Impacts That Would Be Eliminated By New Alternatives," imposition by the Board of Supervisors of a condition on the jurisdictional transfer of the old Main Library building, requiring that the remodeling program for building the comply with the Secretary of the Interior's *Standards for Rehabilitation*, is no longer feasible, in that the building has already passed to the jurisdiction of the Asian Art Commission. The transfer was approved by the Board of Supervisors in June 1996, and was effective July 1, 1996.
- K-7) The SEIR analyzes the proposed changes in glazing and in the discussion of effects on historic architectural resources. The proposed replacement of certain ground floor windows with doorways is included in the list of alterations on p. 73, under Urban Design.
- K-8) The commenters appear to be disagreeing with or misinterpreting the SEIR's alternatives analysis. For clarification, the SEIR finds that the Full Preservation Alternative (Alternative B) "would not adversely affect Exceptionally Significant Interior Spaces designated in Article 10 of the Planning Code, and therefore would be not be anticipated to result in significant adverse effects on historic architectural resources" (p. 106), while the Reduced Impact Alternative (Alternative C) would have effects on historic architectural resources that would be "less substantial" than those of the proposed project, but still significant (p. 109). As stated above, in the response to Comment K-1, both the National Park Service (see Comment Letter A and the State Office of Historic Preservation (see Comment Letter B) have expressed the opinion that both Alternatives B and C would or could comply with the Secretary of the Interior's *Standards for Rehabilitation*. No change in the text of SEIR p. 97 is warranted.

The SEIR authors do not believe renaming of Alternative C is necessary, as this alternative would have *reduced impacts* on historic architectural resources, compared to the proposed project, and it is the function of alternatives to avoid or reduce impacts of a proposed project.

- K-9) The commenters correctly note that the costs of operating the Asian Art Museum are not relevant to the analysis of environmental effects. However, as noted above in the response to Comment K-6, the old Main Library building is currently under the jurisdiction of the Asian Art Commission, which is therefore responsible for maintaining the building. As the Asian Art Commission is a City agency, the building is still owned by the City and County of San Francisco.
- K-10) The commenters' opinions on the project and alternatives are noted, and will be considered by the decision-makers. It is not clear what the commenters mean by the "project sponsor's original plans (not detailed in the SEIR)," and the comment does not include a specific reference. There has not been a prior proposal for the Asian Art Museum at the old Main Library building, although it is noted that a conceptual design, with effects similar to those identified in the SEIR, was evaluated in the Main Library/Asian Art Museum Final EIR.

REFERENCE - LETTER K

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Page & Turnbull, *Historic Structure Report, Old Main Library, San Francisco, California*, August 19, 1998.

G. BLAND PLATT ASSOCIATES
HISTORIC PRESERVATION CONSULTANTS

August 17, 1998

Ms. Hillary E. Gitelman,
Environmental Review Officer
Office of Environmental Review
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

RECEIVED

AUG 20 1998

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING

Re: Asian Art Museum Draft Supplemental EIR 97.750E

Dear Ms. Gitelman:

Thank you for the opportunity to comment on the above-referenced
Draft Supplemental EIR.

GRAPHICS

Figures 6 through 8 on Pages 37 through 39 are difficult to understand because there is no legend. The same comment applies to Figures 12 through 15 on Pages 102 through 105, and the unnumbered, non-paginated floor plans in Appendix A. In presenting an historic building, particularly one of this magnitude, it is helpful if the existing floor plans are used as a base. The architect can then show what will be removed and what will be added, using standard graphics augmented by notes as needed. In this case, the base plan should indicate Room Numbers to assist the reader.

I have been unable to locate existing and proposed Site Plans.
Inclusion of the latter could show the location of Loading Docks.

The only two (2) photographs are on the last page of Appendix A and are captioned Figure A-1. Because they are essential in understanding the proposed exterior changes, it would be helpful if they were placed where they would be useful to the reader. If, for some reason this is not feasible, referring the reader to these at appropriate places in the text would help. Why are there no photographs of the Fulton and McAllister Street elevations?

With regard to Figure 10 on Page 52, it would be more accurate to add "San Francisco" before "Civic Center Historic District" to indicate the locally designated historic district.

362 Ewing Terrace San Francisco, California 94118 (415) 922-3579

EXTERIOR ALTERATIONS

There are a number of elements called out on the various elevation drawings that are neither described nor drawn or photographed. What each of these looks like and where it is placed is important, of course, but there are so many of these that the totality could certainly add additional adverse impacts to the exterior of the project.

Chinese Lions - Page 29 Bullet 2; Page 30, Figure 2;
Page 60; Page 73.

Since these exist, it would be simple enough to include a photo of these. Also need information on the proposed pedestals. Elevation and Site Plan can be used to show proposed placement.

ADA - Page 29 Bullet 3; Page 30, Figure 2.

There is presently a ramp for the handicapped on the South end of the Larkin Street elevation. Is this to be removed and rebuilt? If so, why? If so, this would be a major new design element, the design of which could severely damage the building's primary elevation.

Are there any other interior or exterior modifications being proposed for ADA requirements?

Grass-covered Areas - Page 29 Bullet 4.

Please indicate dimensions and shape of these on Site Plan or elevation. Will these be different or the same as existing? If so, how? What Sculpture is planned for this or these spaces? Would it be permanent or revolving?

Fulton Street Doors - Page 29 Bullet 5; Pages 61, 73.

Converting so many doors to windows destroys the symmetry of this elevation. Project Sponsor must explore ways of reducing this impact. Will the design of these doors be as shown on the elevation? What will the materials be? Same questions apply to new door at East end wall facing Chinese Garden.

Fulton Street Stairs - Page 29 Bullet 6.

Text suggests that these stairs will be modified, but doesn't explain how or why. A photo or drawing of the existing as well as proposed is essential.

Fulton Street Light Fixtures - Page 31 Figure 3.

Are "New Light Fixtures" to match existing in Figure 2?
Where will they come from? Will they be replicated?

Dining Terrace - Page 5 and Figure 3 Page 31.

There is insufficient information on this proposed feature to understand its compatibility or impacts. What are its dimensions? How is it situated between the building and the retaining wall? Will it be visible from the street or screened from view in some manner? Will its surface be hard or grassy?

Moat - Pages 28, 29 Bullets 3 & 6; 59-60.

Please explain this feature including its width and depth. Is it a permanent feature? It appears to be covered in different ways on the Fulton and Larkin elevations, but this is not clear. Drawings would help. What happens to it on the other elevations?

Chinese Garden and Fence - Page 29 Bullet 5;
Figures 4 and 5, Pages 32 and 33.

Is the Chinese Garden and Fence part of Phase One? The Fence design is very important because it appears to become part of the Fulton Street elevation. If the design is as shown, it would negatively impact this elevation. How high will it be? Materials? Please explain both the Garden and the Fence. Is the "New Fence" shown on the McAllister Street Elevation (Figure 5 Page 33) the same or different than that for the Chinese Garden?

McAllister Street Doors - Figure 5 Page 33.

Because there is not a drawing or photograph of the existing elevation, one cannot see the location of the present door here. Will the existing entry be used? What is the design of the proposed entries? How will each be introduced into the historic fabric? What materials will be used?

Hyde Street Elevation - Figure 4 Page 32.

Additional drawings, including a Section, are needed to understand how the 12' high above-ground extension relates to the East wall of the existing building. Are there any openings in the street-wall elevation? What

do the vertical dotted lines above, resembling a plank fence, signify? How will this differ if Alternative B or C is selected? How will additional new construction here affect the large round-arched window on the East elevation? How will 12' extension be structured so that it can accomodate or incorporate later additions? How would later additions affect North and East elevations if addition is 3 stories and 80' high? See Pages 34, paragraph 4; 43, and 74.

Hipped Roof/Mechanical Penthouse Screen - Pages 5-7; 14;
60-61; 74; and 99.

Drawings do not indicate why this is needed. Perhaps a Roof Plan showing location of mechanical items would be helpful as would a sight line study. See Page 34, Para.1.

It is important to note that this architectural element was not used until the late 1920's (350 McAllister) and was more prevalent in the late 1930's when Arthur Brown used this roof design for 50 Fulton and the War Memorial Complex. All of the original Civic Center buildings had flat roofs except City Hall. Also, please note that the roof of the New Main Library is flat to match the Old Main.

Lentelli Sculptures - Page 54.

Do we know for a fact that "Much of the surface detail has been worn away"? Research I did several years ago on Lentelli and other sculptors of that period indicated that many, including Lentelli, often did not detail large figures to be seen from a distance.

STRUCTURAL - Pages 17; 25-29; 36 Bullet 4; 65; 108-109.

The text does not adequately explain the proposed structural upgrade to enable decision makers to understand the need for the work items called out in this document, most of which are highly destructive. As discussed above, drawings do not include legends, so some structural may be included and not be discernible.

Discussion of the Base Isolation System is adequate. Does use of this system require more invasive work on the First, Second and Third Floors than would another system? What does the Structural Engineer see as the building's weaknesses? How does he plan to remedy these and where? What additional structural strengthening will be required create a new floor within the present Second Floor? How much will this cost? What would be required to insert Mezzanines in portions of the Second Floor and how much would that cost? What structural work would be

2
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required to insert "self-contained structures" within these spaces and how much would that cost? How would each of these elements be installed and tied into the existing structural system. Please provide Section Drawings to illustrate.

Do the present drawings show all Shear Walls? We need diagrams or Sections to show how the walls were originally constructed and how much space there is between various walls to help understand the necessity for removing interior walls, and installing "concrete tubes at the four corners of the building and at the Great Hall. Why is this the preferred solution? Also, please explain where "New floors would be installed and existing floor strengthened" and why that is necessary.

On Page 28, Paragraph 4, please explain the necessity for: "unreinforced masonry (brick) walls ... on the East facade would be replaced, with a stucco-like finish for those walls that remain exterior walls...." The existing gray brick used throughout the rear elevation is a character-defining feature which may contradict the author's statement in the first paragraph on Page 60. Why can't it be reinforced? If it cannot be, why wouldn't it be replaced to match existing? What necessitates the permanent removal of the significant windows on the North-facing elevation?

In Paragraph One on Page 28, please substantiate and explain Numbers 4 and 5 dealing with the lack of lateral bracing for the interior plaster ceilings, and the interior plaster walls that "lack appropriate structural support".

SQUARE FOOTAGE

The author compares the square footage between the Proposed Project and the present museum on Pages 3, 19, 24-25, and 43, using different wording each time. I find it confusing, and hope for clarification.

How much square footage does Project Sponsor gain by inserting an entire new floor? By inserting mezzanines? By creating "self-contained structures"?

How much square footage is gained by expanding the present basement under the Hyde Street portion of the site? How many square feet are contained in the proposed 12' Extension on this portion of the site? What is the approximate cost of these two (2) work items?

SHADOWING OF CIVIC CENTER PLAZA

This situation is well presented on Pages 75-77. However, on Page 7, the statement that the Project "could potentially generate

significant adverse shadow impacts on Civic Center Plaza" leaves the reader asking Will It or Won't It?

5
Cont.

CONSTRUCTION STAGING/LANE CLOSURES - Page 44 Paragraph 3.

The author correctly identifies the "substantial adverse impact" associated with closing the curb lanes on Larkin, McAllister and Hyde Streets during construction. No mention is made of using Fulton Street or the vacant portion of the lot on Hyde Street. These, and possibly other alternatives must be explored.

6

ALTERNATIVE B

Throughout the document (Pages 18, 21, 99 and 109), one finds reference to the Museum's Objective of "relating the path of travel to the origin and spread of Buddhism". There is no information to suggest that such an objective could not be met with a perhaps unstated preservation alternative. Further, many museum goers prefer "flexible circulation patterns" due to time constraints or interests. See Page 106, paragraph one.

In the first full paragraph on Page 101, please explain: "The addition on the Northeast (45 Hyde Street) portion of the site would be constructed as proposed." Does this mean per Phase One? Why doesn't this alternative include the possibility of a larger building here as part of Phase One?

7

Under "Reasons for Rejection" on Page 107, the author uses the phrase "substantially less" twice in discussing permanent and temporary gallery space. Please quantify this by saying how much less.

ALTERNATIVE C

On Page 108, in the first paragraph, please explain what "a modified version of the proposed Central Court" would look like. Also, please explain the visual effect of: "The South wall of the building's McAllister Street wing (former stacks) would be removed to open up the Central Court as with the proposed project."

On Page 109, at the top and later, please explain the implications of: "Because it would accommodate some of the currently proposed gallery space at 45 Hyde Street, this alternative would preclude some of the future expansion space anticipated as Phase 2 of the proposed project."

8

Under "Reasons for Rejection" on Page 109, please explain what difference it makes if galleries have different floor-to-ceiling heights. It would seem that such would allow more flexibility for

placing both large and small pieces. Also, why can't floor levels at 45 Hyde and the Old Main be the same height if that is important? The new construction can match existing floor heights and/or a gently sloping ramp system can be used.

8
Cont

ADDITIONAL COMMENTS

At the top of Pages 7, 59, 71 and elsewhere, the author states that: "Project effects on local and national historic districts would not be significant...." What is the justification of this statement? I believe that many would disagree with this, so it appears to be especially emphatic. The same question must be raised later on the same page under Urban Design with respect to the potential impact of Phases 2 and 3. Since Project Sponsor's design for the "12' Extension" creates an impact, why would one suppose that a later addition would be more sensitive or compatible?

9

Under Mitigation Measures on Page 9, using the phrases "to the extent feasible" and "would endeavor to replace them in kind" minimize the effectiveness of the measures. Further, recent CEQA cases would suggest that Project Sponsor would do well to adopt valid mitigation measures.

10

Under Archeology on Page 10, last paragraph, copies of such reports should also be provided to the Landmarks Preservation Advisory Board, the Main Library's History Room, the Foundation for San Francisco's Architectural Heritage, and the California Historical Society Library.

11

On Page 14 under Alternative B, in Line 3 of Paragraph 4, remove "the" at the end of the line. In Paragraph 5, please examine the second sentence beginning with "Two existing...", and explain "as would the existing loctions of the primary". Is this a typo?

12

Pages 15, 43 and 70 discuss the future possible extension along McAllister Street. However, Page 19, Paragraph 3 says that Phase 3 will extend "the old Main Library building's North wing on Fulton Street to Hyde Street." Please explain.

13

On Pages 16, 21 and 107, with respect to the rejection of Alternative B, the text does not quantify "substantially less". It also repeats another of the Sponsor's Objectives: transforming "dark, static areas... into dynamic light filled spaces full of movement". While there is surely a place in this EIR for Project Sponsor's Objectives, this does not seem an appropriate place for this nor a valid reason for rejecting an alternative.

14

Please refer to Footnote One on Page 21. Please insert "National" before Historic Landmark District for accuracy and to prevent confusion. While the Asian Art Museum may not anticipate receiving any Federal

15

funding for the project, FEMA funds were provided to the project following the Loma Prieta Earthquake of 1989. It would be helpful to know who received the funds, how much money was involved and what the money has been used for.

15
Cont.

In reviewing Figure 9 on Page 41, I don't see any historic fabric. And the columns appear to be new or contemporary construction. Am I correct? Why is this so?

16

On Page 54, I cannot visualize how the building ... "in plan resembles a large 'P'."

17

On Pages 62-63, Drawings do not seem to reflect: "A new elevator adjacent to the proposed glass-enclosed stair or escalators would intrude one foot into the Great Hall; this elevator would be linked to the second-and third floor galleries by a pedestrian bridge over the Central Court....Two other pedestrian bridges at the second floor would connect the Great Hall with the proposed galleries...." This is a very significant omission. Drawings also do not show the location of existing elevators with their lobbies.

18

Pages 69 and 70 discuss the Expansion Space, and for the first time, mention is made of a 5 foot setback on Hyde Street. What is the reason for that? What will that space be used for?

19

Under Impact Assessment on Page 73, how can it be said that the "project would preserve and retain most of the principal exterior facades of the Old Main Library Building" when most of the several rear elevations are proposed for demolition? Also, please explain: "New doorways would also be added in the Hyde and McAllister Street facades, and the two set back facades on these streets would be altered by the construction of the proposed Central Court and enclosed stairway (or escalators)." At the top of Page 74, please explain: "Additional free-standing signs ... would also likely be installed at ground level." Where? What would they look like?

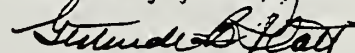
20

On Page 74 in the paragraph regarding Phase 2, the premise about negative effect is faulty because there is no design. Further, the proposed footprint being smaller is not nearly as important as the potential height of a new building in relation to the old. It appears that the height of the new would equal the existing building.

21

Thank you for the opportunity to comment on this document.

Sincerely yours,



Mrs. Bland Platt

LETTER L – G. BLAND PLATT ASSOCIATES

- L-1) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, a number of figures have been added to the SEIR, including interior and exterior photographs and more legible floor plans – both existing and proposed, as requested by the commenter – than those in the DSEIR appendix. The new figures are presented in the SEIR text and in SEIR Appendix A as described in these Comments and Responses.

Regarding Figures 6 through 8, there is a legend on Figures 6 and 7 explaining that the numbers indicated on the figures are room numbers (which are provided for Exceptionally Significant Interior Spaces). The existing and proposed floor plans included in Appendix A of the FSEIR (provided in Section F of the published Draft Summary of Comments and Responses) indicate preservation ratings of existing interior spaces, the areas proposed for demolition, and the proposed use under the project of each interior space.

Figure 6 is the equivalent to a site plan and shows the loading dock at the northeast corner of the site (SEIR p. 37).

The commenter's suggested change has been made in Figure 10, SEIR p. 52 (see Section F of this Summary of Comments and Responses).

- L-2) The SEIR adequately describes the proposed elements noted by the commenter, at a level that is sufficient to determine the significance, under CEQA, of the proposed alterations. The following additional material is provided for the reader's information.

Please see the response to Comment F-2, p. C&R.46, for additional information regarding the placement of **sculpture in the grass-covered areas** in front of the old Main Library building; the proposed **dining terrace**; and the **Chinese garden** (note that the sponsor now proposes a stone wall, rather than a fence, around the garden). Regarding the **seismic moat**, please see the response to Comment B-2, p. C&R.24. Regarding the grass-covered areas, as stated in the response to Comment F-2, the dining terrace would replace the grass and trees atop the building plinth in the eastern part of the Fulton Street side. The Chinese garden would replace the existing grass-covered area at the Hyde Street facade. The project would narrow the other grass-covered areas (on Fulton and Larkin Street) by approximately 6 feet (based on the proposed plans) for installation of the seismic moat. (Compare the plans identified as "Ground Level Existing/Demolition Plan" [Drawing 4] and "Ground Level – Proposed" [Drawing 5], which are included in Appendix A of the FSEIR.)

The proposed location of the **Chinese lions** is not known at this time. However, it is unlikely that the lions' placement could have a substantial adverse effect on the old Main Library building, as they would be a relatively minor element on the Larkin Street facade, and would be a reversible alteration. (Note that the visual simulation of the Larkin Street facade, Figure 10C, p. 60a, depicts the lions on the existing pedestals. This is unlikely to be the selected location.)

The existing **disabled-access ramps** to the Larkin Street entrance must be removed to allow for construction of the seismic moat. The ramps would then be replace in the same locations as at present. As stated on SEIR p. 40, the existing multiple levels on the ground floor of the old Main Library building would be reconfigured into a single level, which would enhance disabled access. As also stated in the SEIR, the existing elevators are not in compliance with the Americans with Disabilities Act (ADA).

Regarding the proposed **new doors on the Fulton Street facade**, please see the response to Comment K-2, p. C&R.89. According to the project architect, the two doors at the cafe and donor/member lounge would be of glass and metal, while the two emergency exit doors (from the two exit stairs) would be opaque and would not have any exterior hardware (Otsea, 1998).

The Fulton Street stairway would be reconstructed to match existing conditions following installation of the seismic moat, except that there would be a approximately six-foot wide stairway built to the east of the Fulton Street doorway to as part of the emergency egress routes from within the building.

Figure 3, SEIR p. 31, has been revised to indicate that only the easterly **light fixture** at the Fulton Street doorway would be new. This fixture would replace the original easterly fixture, which is missing (unless the existing fixture is found), and would match the existing westerly fixture. The westerly fixture would be rehabilitated (Otsea, 1998).

The proposed **doorways on the McAllister Street facade** would be emergency exits only, as stated on SEIR p. 29.

There would be metal service doors in the Hyde Street facade of the **proposed lower level extension**. (The dashed lines on Figure 4 represented a design treatment to simulate divisions in stone, but are not present in the most recent plans for the Hyde Street elevation. As stated in the SEIR, this rear wall of the Great Hall would be finished with the same stucco-like exterior finish as the lower level extension.) There is no detailed design for Alternative B or C to indicate how the Hyde Street exterior might differ from that with the project.

Regarding subsequent construction at 45 Hyde Street with the project, the currently proposed lower level extension is designed to support the potential Phase 2 addition. (The Phase 3 addition would be constructed adjacent to the lower level addition, along McAllister Street.) If Phase 2 were built, it would include a light well adjacent to the windows at the east (rear) wall of the Great Hall by about 18 feet (Killoran, 1998b). This is slightly more than the setback of the former building at 45 Hyde Street. The Phase 2 addition, like the former 45 Hyde building, would obscure views from the street of the large arched window in the east wall of the Great Hall and of the smaller rectangular windows to either side, but would allow light to enter the windows and would permit views outward toward the sky. Figure 16, SEIR p. 109a, showing the first floor of Alternative C, illustrates the location of this horseshoe-shaped light well, to the west of the auditorium. As noted on SEIR pp. 4, 43, 70, and 74, the Phase 2 and Phase 3 construction would

be designed to match the height of the existing old Main Library building with the intent to be compatible with the existing building.

Regarding the **hipped-roof mechanical penthouse / screen**, discussed throughout the SEIR and shown in various elevations, as stated on p. 29 of the SEIR, it is proposed to screen rooftop mechanical equipment; in particular, this includes the boiler room, chiller room, and electrical room, all of which would be clustered along the roof of the old Main Library's Larkin Street wing. Other, shorter heating, ventilation and air conditioning equipment would be on the roof of the Fulton and McAllister Street wings and atop the Great Hall, which would continue the hipped-roof mechanical screen, as shown in SEIR Figure 4, p. 32. The comment regarding the use of such elements in later Civic Center buildings is noted; the SEIR, citing the preservation architect's Preliminary Assessment, finds that this addition "would alter the original design of the old Main Library building and . . . disrupt the existing regularity in the building's elevations" (SEIR pp. 60-61). The National Park Service and the State Office of Historic Preservation have also stated that the hipped roof penthouse would create a false historic appearance on the old Main Library building (see Comment Letters A and B, pp. C&R.7 and C&R.19, respectively).

Regarding the **Lentelli sculptures**, the assessment prepared for the San Francisco Art Commission and Asian Art Museum concluded that surface detail was worn away. It should be noted, however, that the Art Commission has been unable to locate original photographs of the Lentelli sculptures to ascertain the precise nature of the original composition (Lehane, 1998).

- L-3) The base isolation seismic upgrade of the building was recommended by Rutherford & Chekene, Consulting Engineers, and reviewed by Forell and Elsesser Structural Engineers. It is an upgrade developed for the project as proposed. SEIR p. 60 describes how the seismic upgrade relates to the historic fabric of the building. Some of the other information requested by the commenter is also contained within the SEIR (structural weaknesses of the building and proposed seismic upgrade – see p. 25; removal of windows in north-facing elevation is proposed as part of alteration of south Fulton Street reading room – see pp. 61 and 65). The SEIR focuses on changes in the historic fabric that would result from the proposed project, including the seismic strengthening component of the project. As stated in the response to Comment F-11, p. C&R.55, it is possible that refinement of the seismic program could be required as work proceeds.

Regarding the seismic upgrade scheme, as stated on SEIR p. 21,

In seismically upgrading the old Main Library building, the Asian Art Museum seeks to achieve a high level of protection for its collection: no loss of collection value in a Richter Magnitude 7.0 earthquake, and loss of less than one percent of the displayed collection value and no loss of collection value in art storage in a Magnitude 8.3 earthquake.

The following additional information is contained in the Asian Art Museum's application for a Certificate of Appropriateness under Article 10 of the Planning Code:

The concrete shear wall structural system placed over a base isolation system was recommended by Rutherford & Chekene during a thorough study of alternatives in 1992, and Forell and Elsesser Structural Engineers agree with that conclusion. Base isolation is the only method available to protect the building adequately and to reduce the potential shaking and subsequent damage to the museum's collection.

Although base isolation will significantly reduce the lateral forces delivered to the superstructure during earthquakes, the existing building will still require strengthening to survive the larger earthquakes predicted for this site. The proposed new structure design distributes shear walls throughout the floor plate to stabilize all of the building corners. Struts are added to tie the three wings together so that no differential motions are allowed. Steel braces are not considered a viable alternative to the concrete shear walls because concrete walls are much stiffer than even very large steel braces. Additionally, within existing buildings, it is generally possible to form concrete around existing windows and doors as well as to place the walls within existing wall envelopes while steel braces must remain visible and often cause functional problems related to windows and circulation (Asian Art Museum, 1998).

The SEIR identifies two alternatives that would result in less alteration of the old Main Library building. It is for the decision-makers, not the EIR authors, to determine whether the project or an alternative is more appropriate, based on the entire record before them. The decision-makers may request further information concerning proposed alterations from the project sponsor.

Regarding the comment concerning the EIR's statement on p. 60 about the exterior brick, the following revision is made to the third-to-last sentence of the first paragraph on p. 60 to accurately reflect the finding of the preservation architect (new language is underlined; deleted language is indicated with ~~strikethrough~~):

However, the brick is not of primary utmost importance to the character of the building. (Page & Turnbull, 1998, p. 6).

Regarding points 4 and 5 on SEIR p. 28, concerning non-structural deficiencies in the old Main Library building, the *Seismic Upgrading Study* (Rutherford & Chekene, 1992) for the old Main Library building states, "All of the plaster ceilings in the building lack any rational system of lateral bracing or any rigid struts to prevent possible uplift," and:

The great majority of wall and partition finishes in the building, including those veneered with marble, are of a metal heavy lath and plaster construction. If any back-up is provided, it is never with more than a system of light metal furring

channels. Although these finishes, including the DuMond and Piazzoni murals, have performed very well in past moderate earthquakes, they pose a potential safety hazard and threat to the collection in larger earthquakes, given their lack of structural stud back-up. Similarly, the decorative monumental columns in the Delivery Room and Grand Stairway Galleries do not have any rational structural bracing or support. (Rutherford & Chekene, 1992; p. 3-21)

- L-4) SEIR pp. 3 (in the Summary) and 19 (in the Project Description) present the same figures and language, for the total museum program space, including expansion space at 45 Hyde Street. Page 19 discusses gallery space and pp. 24-25 discusses both. The existing museum and the proposed project are compared in Table C&R-1.

**TABLE C&R 1:
COMPARISON OF EXISTING AND PROPOSED MUSEUM SQUARE FOOTAGE**

Component	Existing Museum	Proposed Museum ^a	Change
Total Area (Gross Sq. Ft.)	90,000	180,000	+100%
Total Net (Usable) Area	73,000	121,500	+66%
Gallery Area (Net Sq. Ft.)	28,000	37,000	+32%
Permanent Collection	28,000	29,000	+4%
Temporary Exhibits ^b	—	8,000	n/a

^a Excludes potential expansion space at 45 Hyde Street.

^b Excludes use of Great Hall.

SOURCE: Environmental Science Associates; Hellmuth, Obata & Kassabaum, Inc.; LDA Architects, Inc.; Robert B. Wong, AIA, Architects/Planners; in association with Dott. Arch. Gae Aulenti, FAIA

The SEIR, on p. 36, states that the new third floor inserted in the second floor reading rooms would provide about one-half (14,500 sq. ft.) of the 29,000 sq. ft. of permanent gallery space in the project. However, the 14,500 sq. ft., included about 2,750 sq. ft. that would be provided on the same new third floor within the old Main Library building's north wing, the former book stacks. Accordingly, the second-to-last sentence on DSEIR p. 36 is revised as follows (new language is underlined; deleted language is indicated with ~~striketrough~~):

The new third floor in the two reading rooms and the three smaller corner reading rooms would provide approximately ~~50~~ 40 percent, or about ~~14,500~~ 11,750 sq. ft., of the 29,000 sq. ft. of gallery space for the museum's permanent collection; an additional 2,750 sq. ft. would be gained at the new third floor in the former library stacks.

Under Alternative C, about 33,000 sq. ft. of gallery space would be created within the old Main Library building, compared to 37,000 sq. ft. with the proposed project (Killoran, 1998a).

The lower level extension would occupy approximately 12,000 sq. ft.

Regarding cost issues, it would be appropriate for the project sponsor to provide cost (and other) information to the decision-makers at the time the project is considered for approval, should the decision-makers request such information in their consideration of the project and its components.

- L-5) As stated on p. 76 of the SEIR, the project would generate new shadow on Civic Center Plaza in excess of the Absolute Cumulative Limit. As a result, the impact could be considered significant. However, under Planning Code Section 295, the Planning Commission, with input from the Recreation and Park Commission, must make the determination and could determine that the impact is not significant. As stated on p. 77, "In order for the project to be approved, the City Planning and Recreation and Park Commissions would have to find the new shadow to be *de minimus* (that is, so minimal as to not be significant), or increase the Absolute Cumulative Limit for the space." Thus, the statement in the Summary (SEIR p. 7) is accurate.
- L-6) As referenced in the comment, the SEIR states, in the Project Description on p. 44, "Construction staging for alteration of the old Main Library building would occur at the vacant 45 Hyde Street site and on the various building frontages. It is anticipated that the curb lane and the sidewalks on Larkin, McAllister and Hyde Street would be closed during construction, as would the building setback on Fulton Street between Larkin and Hyde Streets; the sidewalk immediately adjacent to the curb on Fulton Street would likely remain open." Contrary to the commenter's statement, the SEIR does not identify a "substantial adverse impact" from construction. As stated in the Impacts analysis on p. 80, "Construction effects would be temporary and could cause intermittent disruptions to traffic and transit." However, "the project sponsor and construction contractor(s) will meet with DPT, the Fire Department, MUNI and the Planning Department to determine other feasible means to reduce traffic congestion and pedestrian circulation impacts during construction" and "Construction truck movement would be limited to the hours between 9:00 a.m. and 3:30 p.m., or as authorized by the Department of Parking and Traffic (DPT), to minimize peak-hour traffic (including transit) conflicts." The project sponsor could consider the staging areas suggested by the commenter. However, these could have constraints of their own, such as operation of the 19-Polk and 5-Fulton MUNI lines and freeway-bound traffic on Hyde Street and the fact that Fulton Street is a pedestrian mall next to the site. Given this, and the fact that construction effects would be temporary, they are not considered significant.
- L-7) The project sponsor has defined the creation of a circulation path through the museum that links the museum's displays to the spread of Buddhism throughout Asia. According to the sponsor, this cannot be achieved with Alternatives B or C.

The text in question on SEIR p. 101 is intended to refer to the lower level addition. For clarification, the second sentence of the first full paragraph on SEIR p. 101 is revised as follows (new language is underlined):

The lower level addition on the northeast (45 Hyde Street) portion of the site would be constructed as proposed.

Alternative B could include additional construction at the 45 Hyde Street site, similar to that under Phases 2 and 3 of the proposed project. In such case, this alternative would be somewhat similar to Alternative C, which effectively includes the project's Phase 2 component, as stated on SEIR p. 108. As with Alternative C, if this construction were part of Alternative B, the alternative would preclude some of the museum's future expansion space, as stated on SEIR p. 109. As stated previously, the decision-makers could require that certain components of the alternatives be incorporated into the project, as long as those components were adequately analyzed in the Main Library/Asian Art Museum FEIR and/or the SEIR.

As presented in the SEIR, Alternative B would provide a total of approximately 33,000 sq. ft. of gallery space in the old Main Library building, of which about 26,500 sq. ft. would be for the museum's permanent collection and about 6,500 sq. ft. would be temporary exhibition space (Killoran, 1998a). (This compares to the project's proposed total of about 37,000 sq. ft. of gallery space, including 29,000 sq. ft. of permanent collection space and 8,000 sq. ft. of temporary exhibition space, excluding the Great Hall.)

The project sponsor (and others) will have the opportunity to present additional, more detailed information concerning project alternatives to the decision-makers during their consideration of project approval.

- L-8) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, Figures 16, 17, 18, and 19, SEIR pp. 109a-109d, depicting Alternative C, Reduced Impact on Historic Architectural Resources, have been added to the SEIR. As with the proposed project, this alternative would effectively remove the existing wall between the former library stacks and the existing north light well; in both cases, the former stack area would become part of the proposed Central Court, although this would be a two-story space under Alternative C, rather than three stories as with the project, to allow for additional gallery space at level three in Alternative C.

As stated in the response to Comment B-4, p. C&R.24, the use of the 45 Hyde Street space for the current (first phase) program needs would preclude the use of that space for future expansion. As stated in the project sponsor's objectives, SEIR p. 19, "The museum considers this future [Phases 2 and 3] expansion critical to its long-term operational needs, as the museum's collection is expected to continue to grow."

Like Alternative B, Alternative C would provide a total of approximately 33,000 sq. ft. of gallery space in the old Main Library building, of which about 26,500 sq. ft. would be for the museum's

permanent collection and about 6,500 sq. ft. would be temporary exhibition space. Construction at 45 Hyde Street would add approximately 7,500 sq. ft. of gallery space, for a total of about 40,500 sq. ft.. This would be less than under the sponsor's scheme, which would provide about 45,000 sq. ft of gallery space in Phases I and II, including the 45 Hyde site (Killoran, 1998a).

As noted above, the project sponsor (and others) will have the opportunity to present additional information concerning project alternatives to the decision-makers during the project approval process.

- L-9) Regarding effects on the historic districts, as stated in the response to Comment A-4, p. C&R.14, based on comments from the National Park Service (NPS) and the State Historic Preservation Officer (SHPO), the SEIR has been revised to include their opinion that the significant, unavoidable adverse effect on historic architectural resources (the old Main Library building) would encompass effects on the National Register-listed and local historic districts as well.

Concerning the future Phase 2 and 3 expansion, the comment is noted. As stated on SEIR p. 43, the expansion space "could be faced with gray granite or precast concrete panels, intended to be similar in color and texture to the old Main Library building and most other monumental structures in the Civic Center." As stated in the response to Comment F-2, p. C&R.47, the lower level extension would be re clad at the time the future expansion is built with the same masonry to be used on the expansion component(s).

- L-10) As stated at the beginning of the list of mitigation measures for historic architectural resources (SEIR pp. 9 and 84), these measures "would reduce but not eliminate significant adverse effects on Historic Architectural Resources." They are partial mitigation measures.
- L-11) As suggested by the commenter, copies of the report(s) prepared in accordance with the mitigation measure on archaeology would also be provided to the Main Library History Room, and the report(s) would be available for reproduction by Heritage, the California Historical Society, and the Landmarks Board. A copy would be on file at the Planning Department.
- L-12) To correct editing errors, the second sentence of the fourth paragraph under "Alternative B" on SEIR p. 14 is revised as follows (deleted language is indicated with ~~strikethrough~~):

This alternative would avoid putting all the new boilers, chillers, cooling towers, air handlers and ductwork on the roof of the existing building within a new hipped roof penthouse, as ~~the~~ would the project; instead, these elements would be located elsewhere in the building or off-site to reduce the impact on the exterior massing of the building.

The second sentence of the fifth paragraph under "Alternative B" on SEIR p. 14 is revised as follows (new language underlined):

Two existing ornamental stairs in the south wing would also be retained, as would the existing locations of the primary elevators.

(Note that the correct language appears on SEIR p. 100.)

- L-13) The second sentence of the third paragraph on SEIR p. 19 is revised as follows (new language underlined; deleted language is indicated with ~~striketrough~~):

Finally, in a third phase also analyzed in this SEIR, the museum seeks to provide for further expansion by construction of an extension to the old Main Library building's north wing on ~~Fulton~~ McAllister Street to Hyde Street.

- L-14) Regarding the difference in floor area between Alternative B and the proposed project, please see the response to Comment L-7, above.

Concerning the project sponsor's reasons for rejecting alternatives, please see the response to Comment J-7, p. C&R.83.

- L-15) The commenter's requested change is made in footnote 1, SEIR p. 21.

Regarding FEMA funding of the repair of earthquake damage, please see the response to Comment K-3, p. C&R.90.

- L-16) As stated in the first bullet on SEIR p. 36, "The interior walls of the Central Court (including the former light court walls) would be finished in an 'art waxed' plaster. The eastern end of the Central Court would include glass walls on either side of the existing Great Hall." These would be new finishes and materials. Also, as revised herein, "The Central Court would also be open to the Monumental Staircase with removal, from the loggia (balcony) at the top of the staircase, of the non-structural walls panels (and steel columns within the walls) supporting the existing Gottardo Piazzoni murals; the wall base and entablature in the loggia (including inscriptions) would be retained, and new structural columns would be added." Within the loggia and the Monumental Staircase, existing finishes and materials would be retained (except at the east end of the loggia; see the response to Comment J-4, p. C&R.78), as depicted in the visual simulations of new Figures 11A and 11B, SEIR pp. 67a and 67b.

- L-17) The reference to the building resembling a "P" in plan can be seen on Figure 8, SEIR p. 39, in which the building resembles a "P" with Hyde Street is at the bottom of the "P."

- L-18) Please see Figure 7, SEIR p. 38. In this plan view, both the new elevator and the pedestrian bridges are labeled. Regarding the existing elevators, they are not shown because they are proposed for removal. However, the first floor elevator lobbies, which would be demolished, are

depicted in Figure 6, p. 37 (rooms 192 and 193). Please also see the existing floor plans in Appendix A, which depict the existing elevators.⁶

- L-19) The first reference to the 5-foot setback appears in the Project Description, on SEIR p. 43, near the end of the first paragraph under "Expansion Space," and it is also mentioned later in the SEIR, as noted by the commenter. The setback is to accommodate the seismic moat, which will also surround the lower level extension and the potential Phase 2 and Phase 3 expansion space.
- L-20) The principal exterior facades are those on Larkin, Fulton, McAllister, and Hyde Streets (east end of Fulton Street wing), with the more ornamented Larkin and Fulton facades and the east end of Fulton Street wing, on Hyde Street, generally considered the most important facades. As stated in the National Register of Historic Places nomination form for the Civic Center Historic District:

The Larkin and Fulton Street sides are the principal facades, and together with the end of the ell⁷ on Hyde and a flat pavilion around the corner from Larkin on McAllister Street, are treated in the Italian Renaissance style. The remainder of the McAllister Street facade is more simply expressed. The other exterior walls on the north and east [which are those mentioned by the commenter] . . . and two interior light courts are ordinary brick (Corbett, 1974).

The new doorways in question are one door proposed on the east (Hyde Street) facade of the south wing (to the Chinese garden) and the two emergency exits proposed on McAllister Street. The set back facades on Hyde and McAllister Street are those referred to by the commenter as being mostly demolished: the east wall of the Great Hall and north wall of the Fulton Street wing. As stated on SEIR p. 71, the exterior brick would be removed from these walls.

Proposed free-standing signage is at the conceptual design stage and no detailed descriptions are available.

- L-21) As stated in the response to Comment L-9, above, the exterior of the Phase 2 and 3 expansion would be intended to be compatible with the old Main Library building and other Civic Center structures. The expansion would be comparable in scale and massing to surrounding development, as noted on SEIR p. 74. It would be the same height as the old Main Library building. Therefore, it was determined that the visual impact would not be significant for CEQA purposes. In view of the above, other design issues would be appropriately discussed during the approval process.

⁶ The project sponsor's application for a Certificate of Appropriateness contains interior elevations of the Great Hall, one of which, Drawing 24, also depicts the new elevator. The application is available for public review in the project file at the San Francisco Planning Department, 1660 Mission Street, Case No. 97.750A.

⁷ ell – a wing of a building at right angles to the main structure (American Heritage Dictionary).

REFERENCES - LETTER L

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Asian Art Museum, Application for Certificate of Appropriateness, revised August 19, 1998. The application is available for public review in the project file at the San Francisco Planning Department, 1660 Mission Street, Case No. 97.750A.

Corbett, Michael, Nomination form for National Register of Historic Places. December 2, 1974.

Killoran, Jim, Project Manager, New Asian Project, memorandum to Carol Roos, San Francisco Planning Department, November 20, 1998a.

Killoran, Jim, Project Manager, New Asian Project, memorandum to Carol Roos, San Francisco Planning Department, November 6, 1998b.

Lehane, Debra, Collections Manager, Civic Arts Collection, San Francisco Art Commission, telephone communication, September 9, 1998.

Otsea, Mark, HOK/LDA/RWA joint venture architects, memorandum to Jim Killoran, Project Manager, New Asian Project, October 19, 1998; Attachment A in Killoran, 1998b, memorandum, cited above.

Rutherford & Chekene, 1992, *Seismic Upgrading Study of the Main Public Library Building, San Francisco, California, for the Asian Art Museum at the Civic Center*, September.

Tsuyako "Sox" Kitashima
1911 Bush St. #1G
San Francisco, CA 94115

August 20, 1998



San Francisco Planning Commission
401 Van Ness, Room 428
San Francisco, CA

RE: SUPPORT FOR ASIAN ART MUSEUM EIR.

Dear Commissioners:

I am writing to support the adoption by your Commission of the Asian Art Museum EIR and SEIR so that the project can be certified for the next step.

I am well aware of the pressing need for the Asian Art Museum's plans to move to the Old Main Library through my various involvement in cultural and community activities. In working with projects such as the Asian American Arts Foundation's annual Golden Ring Awards, annual Day of Remembrance concert commemorations, Kimochi's Sansei Live, and a host of other programs combining the arts, community services and advocacy, I am always dismayed to find the lack of adequate facilities in the City for Asian American arts. In a City such as ours, with such a high percentage of Asian Americans and retired people, I believe we still lack cultural facilities that are accessible, affordable and well-equipped.

My most recent experience involving the Bruce Lee tribute at the Asian Art Museum emphasizes my concerns. While we were grateful that the Asian was available and supportive, I was very concerned that both the youth and the elderly would not be able to find the place and have access, especially after dark. The new location would be a vast improvement in that regard.

I understand that the necessary reports for the Asian's move have been carefully reviewed and that the many concerns have been taken into consideration. I hope that you will not add to the delay of this important project.

Sincerely,


Tsuyako "Sox" Kitashima

LETTER M – TSUYAKO “SOX” KITASHIMA

- M-1) The comment is noted. The commenter does address the adequacy or accuracy of the Draft SEIR, and no response is required.

August 20, 1998

Hillary E. Gitelman, Environmental Review Officer
San Francisco Planning Department



From: Milton Marks III *MM*
55 Jordan Avenue
San Francisco, CA 94118

Final SEIR for the Asian Art Museum Project

would like to offer the following comments and questions on the Final SEIR draft:

Why would the Asian Art Museum choose to relocate to a building in which the expansion of gallery space required the alteration of so much significant architectural space? Often, problems in adaptive use stem from trying to fit a use into a space rather than having the historic space facilitate appropriate use. Shouldn't the Asian Art Museum expect its stewardship role to extend to protecting the historically significant parts of the Old Main Library? Shouldn't the Museum be prepared to compromise its program which was determined after it chose to move to this building?

1

The Final SEIR is replete with uncertainties about replacement or retention of features. How can the impact of the project be known if the final actions are undetermined? For example, how much of the interior features are being removed? How will actions affecting historic features be determined and monitored?

2

Approvals or permits may be issued before the Final SEIR is certified (p. 44)." How have prior changes, including the 45 Hyde Street demolition and the installation of the name change on the Larkin Street façade been allowed to occur?

3

The choice of art conservators for assessing the options for the Piazzoni murals was limited, in part by a requirement that a majority had to have had experience removing murals. Since many conservators would not sanction removal of art works from their original setting, this selection process skewed the conclusions in favor of the Asian Art Museum's preferred option. What did the conservators conclude about potential damage to the paintings in various treatments? The Final SEIR should reference the American Association of Museum's policies on the proposed treatment of the murals. Also, there are other reports/statements by qualified experts such as the Judd FAIA which should be referenced in the Final SEIR.

4

Although most of the attention has been focused on the Piazzoni murals, what is the impact of the proposed removal of the duMond murals?

5

What does Article 10 say about Certificates of Appropriateness for changes to interior features?

6

Thank you.

LETTER N – MILTON MARKS III

- N-1) The comment is acknowledged. It does not address the adequacy or accuracy of the SEIR, and no response is required. The comment concerns the project sponsor's choice and approach to the project and would be germane to the project approval process.
- N-2) Project effects on the building's important historic architectural interior spaces are identified in the SEIR in Table 3, p. 63, discussed in the SEIR text, and shown in graphic form. Regarding individual components of interior spaces, please see the response to Comment F-19, p. C&R.57. Regarding inscriptions in the old Main Library building's interior, please see the response to Comment F-5, p. C&R.49. The SEIR conservatively assumes the broadest impact on design details where such details are not known; for example, by describing alterations as demolition of some spaces in which some design detail could be retained.
- N-3) The SEIR document commented upon is a draft document. These comments and responses will be included in the Final SEIR. As stated on SEIR p. 1, in the Introduction, separate Certificates of Appropriateness were previously granted for demolition of the 45 Hyde Street building and installation of new signage on the old Main Library building; the impacts of these changes were adequately analyzed in the Main Library/Asian Art Museum Final EIR and the 1996 EIR Addendum.
- N-4) The commenter correctly states that the Board of Supervisors' Resolution No. 376-97 urging the Asian Art Museum to create a Piazzoni Murals Review Panel specified that the art conservators selected to serve on the panel should have experience in mural removal. This was because one of the panel's responsibilities was to analyze whether the murals could be safely removed from the old Main Library building. Presumably, such an analysis required a working knowledge of mural removal. At any rate, it is noted that the qualification criteria did not prevent one panelist from arguing against removal of the murals, as is stated on SEIR p. 66.

The Bruce Judd report cited by the commenter is referenced on SEIR p. 68.

Regarding the Piazzoni murals, please see also the responses to Comments F-6, p. C&R.50, and J-5, p. C&R.80.

- N-5) Regarding the DuMond murals, please see the response to Comment F-7, p. C&R.52.
- N-6) A number of interior spaces in the old Main Library building are designated Exceptionally Significant Interior Spaces, as identified in Appendix J of Article 10 (Sec. 10). As stated on p. 51 of the SEIR, a Certificate of Appropriateness is required for alterations to Exceptionally Significant Interior Spaces.



August 15, 1998

Hilary E. Gitelman, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco, California 94103

Re: Comments on Draft Supplemental Environmental Impact Report, The Old Main Library/The Asian Art Museum

Dear Ms. Gitelman:

I recently reviewed a copy of the Draft Supplemental EIR. While an impressive document I feel strongly that several additions and amendments should be made in order to better assess the project's impact on the Old Main and the Civic Center Complex:

1. Study should be made of the project's radical change in interior light levels.

According to the museum and architect, Gae Aulenti, the key to the project's design is the creation of light-filled spaces, "a sky-lighted piazza that wraps around the grand staircase". This singular design criteria mandates the demolition and/or removal of very significant artistic and historic material from the Old Main.

The increase in light levels is a very controversial issue considering the mitigating actions that have had to be installed in other Aulenti designs. The classic example is the Palazzo Grassi in Venice. Here, as in the proposed project, the galleries open onto a sky-lighted courtyard. In order to mitigate against the increased UV light levels the "windows" onto the central court had to be heavily curtained to protect light sensitive objects. It should also be noted that the skylights also creates a "greenhouse" effect: even during cool fall and winter weather the interior of the Palazzo Grassi can be uncomfortably warm and noticeable humid.

How will the museum mitigate against increased light levels? To use curtains or screens, as in the Palazzo Grassi, will negate their design objective--the creation of the light, transparency of space. Further, you will be removing very significant historic material (mural walls of the loggia) just to replace it with inferior, temporary material. The museum needs to address and justify the change in light levels not only for its impact on the Old Main, but on its own priceless collection.

2. Study of exhibition concepts for second floor loggia under a preservation alternative.

The radical treatment of cutting out the mural walls of the loggia begs serious justification. Considering the significance of this interior space, all modifications are to reflect or complement the style, color and spatial relationships of the architecture. Remembering that the mural walls are @ 14' x 7' the placement of the ceramic vitrines are completely out of proportion for the space. Dr. Sano mentioned the placement of sculpture (pg. 68); however, even with a seismically retrofitted building the idea of securing monumental sculpture (at least 10' - 12' tall) to the

window casement seems cavalier. The idea of the monumental Ming scrolls is appealing; however, realistically they can not be displayed in light-filled space. Further, if Dr. Sano is proposing the scrolls fill the mural wall spaces there is the potential for damage from the flexing of the paintings from air currents in the building.

A preservation alternative that keeps the murals in situ could offer as much, if not more, exhibition space without destroying the color, style and scale of the loggia. Vitrines could be placed throughout the loggia without seriously impeding wheelchair or foot traffic (needs study). The mural walls could be screened over part of the time to accommodate monumental scroll paintings from the permanent collection, or from traveling exhibitions. Again, the enclosed loggia provides a far more flexible exhibition space for precious light sensitive objects than one perforated with light. Since a preservation alternative appears to provide better exhibition space a more serious justification of the project design needs to be presented.

2
Cont.

3. Further discussion of the Piazzoni Murals Review Panel reports.

Because the panel could not reach consensus separate reports were submitted and need to be discussed at length. In particular, the comments on the preservation alternatives made by Bruce Judd as a representative for the Landmarks Preservation Advisory Board should be presented and discussed more seriously.

The LPAB and the Planning Department needs to understand from the preservation architects and conservators which actions will best preserve for future generations the significant historic and cultural material represented in the Old Main.

3

Reversibility has been miserably discussed in this report. To simply state that floors can be taken out and walls replaced at a later date does not mitigate against the irreparable alterations that are proposed for the Old Main.

4. Projected cost analysis for conservation and care of Piazzoni murals if removed and prepared for reinstallation.

The fate of the Piazzoni murals if removed from the Old Main is far from secure. While the museum will support the conservation of the murals to the amount of \$250,000.00 the city needs to better understand the cost of removing, cleaning the front and back, selecting a suitable support and attaching murals to support, and storage of unmounted and mounted murals. The actual cost of removal and conservation has not been seriously discussed. The money offered by the museum would only cover a fraction of the costs; what agency will be responsible for the remainder? If there are no funds available does this mean that the murals will be rolled up and allowed to deteriorate until they can be reinstalled in the Old Main should the museum out grow the building at a future date?

4

Simply put: if there are no city funds to remove, store, conserve and reinstall the murals properly then removal of the monumental landscape program is tantamount to its destruction.

Cost should be compared to costs of preservation in situ.

5. "Changes to the historic district"

The author's need to substantiate their conclusion that the substantial and adverse changes proposed for the Old Main will not affect the buildings status in the historic district. What authorities back this position? Further in the report they note that David Look and Cherilyn Widell noted that "the project would not meet the Secretary of the Interior's Standards for Rehabilitation." Citation of authoritative support for this conclusion is needed

5

6. Remove phrase, "if any" from pg. 66, paragraph 3, line 2.

"Conservators who reviewed the murals were divided in their opinions as to the extent of damage, if any,..." The report shows that all conservators felt there will be damage. The phrase, "if any" is a misleading and unsubstantiated modifier.

6

7. Further delineation of the role of the preservation architect.

The hiring of a preservation architect appears to be the major mitigation measure proposed by the museum. There is no definition of the role and authority of the preservation architect to act as advisor/consultant. If the PA is the key mitigation measure are we assured that the museum will act fully on their recommendations? We need to understand that the PA and the museum act as one; that each time this document states "the museum believes ..." that the preservation architect can be substituted with equal veracity.

7

8. Illustration of Larkin Street with Old Main and New SFPL.

Helpful to have an illustration of that shows the current building with project alterations (new roof line and Chinese lions) within the context of the other buildings in the Civic Center complex. Particularly, the Larkin Street facades of both the Old and New libraries.

8

9. Illustration of cross gallery views

As the museum is going to remove the mural walls of the loggia in order to create cross-gallery vistas it is important to get a real sense of what they are creating. There is an illustration looking up from the central court, however, this is not sufficient. The museum's rationale for removing the walls from the loggia is to create vistas from which the museum goer can orient themselves. As most of the traffic will circumambulate through the galleries it is important to get a sense of what that the north-south view through the perforated loggia looks like. Right now this state is only suggested in their model.

9

Thank you for your consideration.

Yours sincerely,



Colette Tanaka

Collections Manager

2 Broadmoor Avenue

San Anselmo, California 94960

LETTER O – COLLETTE TANAKA

- O-1) The commenter is concerned about the increase in light in the building and its potential effects, including effects on the collections and on patrons' experience in the museum. While these increases relate to effects of the project worthy of consideration during the project approval process, they are not physical effects on the environment as defined by CEQA, and no response is required here. For information, the project sponsor indicates there will be no curtains placed in windows within the museum, except in the Great Hall (Room 200), which is intended to be used as an auditorium pending completion of the potential Phase 2 expansion space, and therefore would require light control during certain presentations. It should also be noted that the climate in San Francisco is different than in Venice.
- O-2) This comment addresses the museum's proposed use of the second floor loggia for display of its collection; it does not address the adequacy or accuracy of the SEIR, and no response is required. The SEIR presents two alternatives what would preserve the murals *in situ* and the loggia walls.
- O-3) The SEIR includes an extensive discussion of the Piazzoni Murals Review Panel, as well as the conclusions of the three other art conservators who examined the murals. Please see the response to Comment J-5, p. C&R.80, for additional discussion of professional and lay opinions on the disposition of the Piazzoni murals. In addition, please see the responses to Comments F-6, F-10, and F-20, pp. C&R.50, C&R.54, and C&R.57. The SEIR adequately presents the opinions and differences of opinion of these experts. Further detailed information requests would be more appropriate to the project approval process, rather than environmental review.

Regarding reversibility, the SEIR, based on the preservation architect's Preliminary Assessment, describes two specific changes as potentially able to be removed at a later date: the proposed third floor within the two-level second floor reading rooms (p. 65) and conversion of the existing Fulton Street entry lobby to a dining room (p. 69). In the case of the former, more extensive alteration, the SEIR does not use this information to conclude that the impact of installing the new third floor would be lessened.

- O-4) Please see the response to Comment B-8, p. C&R.27.

Regarding preservation of the murals in place, please see the response to Comment F-10, p. C&R.54. The project sponsor estimates that the cost of preservation of the murals *in situ* would be at least as much as the estimated \$250,000 cost of removal and restoration (Killoran, 1998c).

- O-5) As stated in the response to Comment A-4, p. C&R.14, based on comments from the National Park Service (NPS) and the State Historic Preservation Officer (SHPO), the SEIR has been revised to include their opinion that the significant, unavoidable adverse effect on historic

architectural resources (the old Main Library building) would encompass effects on the National Register-listed and local historic districts as well.

- O-6) The commenter's suggested revision is made in the first sentence of the third paragraph on p. 66 (deleted text shown in ~~strikethrough~~):

Conservators who reviewed the murals were divided in their opinions as to the extent of damage, ~~if any~~, that would be sustained by the murals in removing them from the walls.

- O-7) Page & Turnbull, preservation architect for the Asian Art Museum project, is part of the project design team. However, the preservation architect and the project sponsor are not interchangeable in the sense implied by the commenter; the role of the preservation architect, as with all architects, is advisory, and decisions are made by the sponsor. The preservation architect's primary responsibilities include assistance in design development, completion of the Historic Structure Report (published August 1998), advising the design team on project effects on the historic fabric of the old Main Library building, recommending restoration techniques for historic components to be retained, and preparation of the protection and preservation portions of the project related to historic fabric. The preservation architect would have an ongoing role in the project during construction to provide construction administration in regard to the preservation components of the old Main Library building.
- O-8) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, a Figure 10d, SEIR p. 60b, has been added to the SEIR showing the proposed project and the new Main Library side-by-side, to illustrate the effect of the proposed hipped roof mechanical penthouse.
- O-9) Please see "Architect's Rendering of Proposed Central Court, Looking Southeast from Stair Loggia," included as Figure 9a, p. 41a.

REFERENCE - LETTER O

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Killoran, Jim, Project Manager, New Asian Project, telephone communication, November 18, 1998c.

THOMAS WOOD

4301 Nicasio Valley Road
Nicasio, California 94946
(415) 662-2006

RECEIVED

AUG 18 1998

SAN FRANCISCO
PLANNING

P

Hillary E. Gitelman, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street
San Francisco CA 94103

August 16, 1998

re: Asian Art Museum Draft Supplemental Environmental
Impact Report, Published July 18, 1998

Dear Ms. Gitelman,

I wish to register my comments on the SEIR for the
Asian Art Museum's proposed project in the Old Main Library.

My interest is specifically in preserving in place the
Gottardo Piazzoni murals which surround the main Monumental
Staircase (S101) and the second floor stair loggia (Room
290). The staircase and the loggia, including the Piazzoni
murals on three walls, are designated Exceptionally Significant
Spaces in Article 10 of the San Francisco Planning Code.

For reasons of historic preservation, for artistic preser-
vation (both major San Francisco newspapers' art critics have
strongly urged that the murals be preserved in place, as have
a host of curators, art historians, conservators, and concerned
citizens) and for the architectural integrity of the building,
as well as the landmark status of the interior spaces of the
Old Main, the Gottardo Piazzoni murals must be retained in
their present location.

I urge the Planning Commission to adopt either Alternative
B, the Full Preservation Alternative, which would achieve
seismic strengthening "without removal of the existing Piazzoni
murals" (SEIR p. 99), and further provide that "the Piaz-
zoni murals on three walls would remain intact..." (p.100),
or adopt Alternative C, Reduced Impact on Historic Architectural
Resources, which would also

retain intact the second floor stair loggia
(Room 290) and Corridor 291A, including the
Piazzoni murals in Room 290. (p.107)

The project sponsor's reasons for rejection of Alternative
C are weak and vague, hardly justifying the removal of such
a valuable asset to the city as the Piazzoni murals. The
objection that varying floor levels will cause "circulation
problems" (p.109) is an easily surmounted challenge; the

further objection that "future expansion" would be hindered is not sufficiently demonstrated; the window openings created by the murals' removal are irrelevant to future expansion anyway, and such openings create less, not more wall space. The objection that the "path of travel" will be compromised is spurious; it is the job of the architect to design a museum that retains protected features of the building, not demolish all of those features that seem inconvenient to her plans.

The justification given by the project sponsor for removal of the Piazzoni murals is in order that windows may be cut into the walls; this is a design element and not a necessity. The architect's own plans showing the apertures thus created indicate (drawing, p. 67) glass display cases in the openings which could just as easily be installed in front of the murals, or near the railings above the staircase. Exhibits could be still installed temporarily in front of, and even obscuring the murals from time to time, without the drastic measure of removal.

The architect Gae Aulenti's argument that the murals should be removed because they "could be damaged during construction" (p.68) is spurious and circular reasoning: both conservators Rosenthal and Silver say that "preservation would be possible during construction by enclosing the murals in solid, climate-controlled boxes" (p.66).

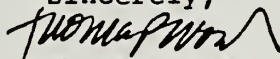
1
Cont.

I believe in the overall argument of conservators Rosenthal and Silver that the Piazzoni murals " were created specifically for the Main Library and are integral to the architecture of the building" and therefore should be retained in place (p66).

If landmark status has any value whatsoever, if historic and artistic preservation have any place in city planning, as delineated in the city's own Planning Code, then the Planning Commission must take seriously the compromise Alternatives B or C to this project. A compromise middle ground needs to be found that will allow the Asian Museum to realize its plans for a distinguished museum structure and at the same time allow for the preservation and retention of this profoundly significant work of civic art, the Piazzoni murals.

Especially in view of the fact that the murals are an integral architectural feature which in no way would be incompatible with an Asian art museum but rather would enhance the experience of art in its San Francisco context, I strongly urge that the Planning Commission adopt either Alternative B or Alternative C, and thus retain the Piazzoni murals in place.

Sincerely,



Thomas Wood

LETTER P – THOMAS WOOD

- P-1) The commenter's comments in support of retention of the Piazzoni murals are noted. Please see also the responses to Comments F-6, F-10, F-20, and J-5, pp. C&R.50, C&R.54, C&R.57, and C&R.80.

SECTION D

PUBLIC HEARING COMMENTS AND RESPONSES

This chapter contains a transcript of the public hearing on the Draft SEIR and the responses to those comments. Each substantive comment on the Draft SEIR is labeled with a number in the margin and the response to each comment is presented following the commenter's remarks. For purposes of sequential reference with the written comments, these comments are designated as though they were contained in a second set of comment letters. Therefore, comments from the first speaker at the public hearing are answered in responses AA-1, AA-2, etc., from the second commenter, in responses BB-1, BB-2, and so on. Where responses have resulted in changes to the text of the Draft SEIR, these changes will also appear in the Final SEIR.

The reader should note that many responses refer to responses to comment letters, as some members of the public reiterated at the public hearing the comments made in comment letters.

Comments AA

David Bahlman, Heritage.

It is Heritage's opinion that, in general, the draft Supplemental EIR lacks an adequate discussion of the impacts associated with the Asian Art Museum's proposed design plans to alter the interior of the old Main Library. In particular, I believe the draft SEIR has five significant flaws.

First, the project description of the draft SEIR does not adequately describe the impact of the project on exceptionally significant interior public spaces. These are spaces spelled out in Article 10 of the planning code.

Secondly, the draft SEIR mistakenly asserts that in order to seismically retrofit the building, the loggia walls along the Piazzoni murals are mounted need to be demolished.

Thirdly, the draft SEIR fails to adequately analyze the full impacts associated with the removal of the Piazzoni murals and the destruction and/or alteration with other exceptionally significant interior spaces in light of the significant impacts associated with such activities, which cannot be fully mitigated.

AA-1

Remember the significant interior spaces are the lobby on Larkin Street, the staircase, the loggia, the great hall, and the reading rooms. Those are basically the significant interior spaces spelled out in Article 10.

Moreover, the rationale for proceeding with the project in light of the unmitigated impacts to exceptionally significant interior spaces has not been explained.

Fourth, the proposed mitigation for the removal of the Piazzoni murals is inadequate.

And, lastly, the rationale for the rejection of both Alternative B and Alternative C is flawed and not supported by substantial evidence in the record.

On the basis of the above-described five inadequacies – which will be discussed in more detail below – I have handed up a copy of the letter to Hillary [Gitelman, San Francisco Environmental Review Officer], which we have drafted. It is the position of Heritage that the draft SEIR should not be certified as legally adequate for the purpose of approving the project. (David Bahlman, Executive Director, Foundation for San Francisco's Architectural Heritage ("Heritage"))

Responses to Comments AA

AA-1) The commenter summarizes comments made on behalf of his organization in writing. Each of the five points is responded to in the responses to Comment Letter H, which begins on p. C&R.69.

Comments BB

My name is James Fang. I am the president of the Asian Week Newspaper. I am here to speak to urge you to accept the draft SEIR, because I think it adequately represents what will become a jewel in the San Francisco fabric of presenting Asian American – Asian art in our city.

It is an opportunity to accept this report as it is because it is creating space in a place in which forty nations, the culture of forty nations can be truly demonstrated. I think it is an opportunity for this city to move forward on such a very important project.

I know that many of our readers at Asian Week are very much supportive of this project and would urge that in October, or whenever the Commission decides to accept the EIR, that they will vote on it, that they accept the draft EIR. (James Fang, President, *Asian Week*)

BB-1

Responses to Comments BB

BB-1) The commenter does not comment on the adequacy or accuracy of the Draft SEIR or raise issues related to environmental review, and no response is required.

Comments CC

We are a collaboration of many Chinatown agencies, and I am here to ask that the Supplemental EIR reflect the community's support that the Asian Art Museum has, that if it goes forward as planned, the youth and the families of Chinatown and all the other communities, and the rest of San Francisco, would have a museum we would all be proud of and that we support, and the after-school program and the kids would be able to have a place to go in addition to the library, which is very close to it. (Sylvia Hom)

CC-1

Responses to Comments CC

CC-1) The commenter's expression of support for the project on behalf of the Chinatown community is noted. The commenter does not address the content of the SEIR, and no response is required.

Comments DD

I am Alice Lowe, a commissioner with the Asian Art Museum and a docent for many years.

During my volunteer work with the museum, I also worked very closely with a great many community groups, particularly minority and ethnic groups. So I have a very good feeling of how the community feels about this project.

As far as the actual construction details go, I know, because I am associated with the museum, a great deal of thought has been given to the design both interior and exterior of this project.

DD-1

As far as the certain details and as the Piazzoni paintings are concerned, I would say – I would say that the perpetuation of the murals in their present location will be a great handicap to the proper use of that space. The museum, through its trustees and its staff, has hired a world-famed architect, Gae Aulenti, to work with them in making the best use of this display space.

The museum has different needs from that as a library, and I think it is important to keep that need in mind.

I also wanted to remind all of us that the museum is moving into the Civic Center because it was doing so at the mandate of the voters of San Francisco. In 1994, over 71 percent of the voters authorized the museum to proceed with a construction of this new project and to make those necessary changes so that it could fulfill its mission of creating a great and wonderful museum for the museum's fabulous collection.

DD-1
(cont'd.)

The museum has one of the world's greatest collections of Asian art. It has been estimated to be valued at four billion dollars, and is the city's single greatest asset aside from its real estate.

So I urge you to assist the Asian Art Museum in proceeding with this project, a project which would end up in a museum of great benefit to the City of San Francisco and also make it a designated attraction for visitors from all around the world. (Alice Lowe, member, Asian Art Commission, and Asian Art Museum docent)

Responses to Comments DD

DD-1) The commenter's support for the project is noted. The commenter does not address the content of the SEIR, and no response is required.

Comments EE

I am Robert Allen, a docent for the Asian Art Museum.

I urge your support for the Draft SEIR and the issuance of the Certificate of Appropriateness.

My remarks will be on the Civic Center and its historical and architectural resources, SEIR Pages 6, 7, 50 to 53.

EE-1

A civic center such as ours must provide much in the way of cultural resources if it is to continue to meet the promise of its auspicious beginnings. We need the things that support the cultural life of a great city: Symphony Hall, Opera House, City Hall, a great library, and so on. It strikes me that without the New Asian, the visual arts component will be lost from Civic Center and the old Main would be left as a derelict building giving the overall impression of urban decay. (Robert Allen, Asian Art Museum docent)

Responses to Comments EE

EE-1) The comment is noted. The commenter does not make any specific remarks about the content, adequacy or accuracy of the Draft SEIR, and no response is required.

Comments FF

I am Jim Haas. I am the chairman of Civic Pride, which is the Civic Center advocacy group, and I wish to address the accuracy and completeness of the EIR. Some of my remarks will refer to some of the voluminous correspondence which, hopefully you will recall from last year, is relating to the history of Civic Center.

I think the [S]EIR as prepared is inadequate, particularly the discussion of the history of San Francisco. It uses derivative material to explain what Civic Center is about and its history. And if you recall my correspondence, the case studies for the city landmark and the other are, at various degrees, deficient in themselves. I think we need a full discussion of the derivation of Civic Center, of the key players, of John Galen Howard, one of the most prominent architects of his day, who was Chairman of the Board of Architectural Advisors who prepared the plan, who did the competition for City Hall. Galen Howard was particularly involved in the selection of the site for the library doing a kind of complicated real estate transaction with the property where the school district is now.

FF-1

Also there's no mention of Former Mayor Phelan, who was the city's commissioner at Chicago World's Fair, the sort of icon of the City Beautiful Movement. Former Mayor Phelan was a library commissioner. He was on the board that chose the [architect for the Main] Library.

Why am I saying all this? That is because the way the EIR is currently written, it does not give you enough information to make choices. It is structured so that small things, like Piazzoni murals, are equal to the larger things. And I think anyone who, including the public, is going to try to wade through the issues before you, that will come before you, need a lot more information on the history, the values behind Civic Center, and the relative values that we are going to be faced with. So I think there's more work to be done there.

There is also a deficiency in the transportation section that has not mentioned the study which the Transportation Authority has funded to improve service in and out of the Civic Center transit station, and that needs to be added as well. (James Haas, Chairman, Civic Pride)

FF-2**Responses to Comments FF**

FF-1) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, this document is a Supplemental EIR that relies on information included in the Main Library/Asian Art Museum Final EIR, as well as a 1996 Addendum to that FEIR. The Main Library/Asian Art Museum Final EIR (pp. 56-57) states that architect John Galen Howard, along with Frederick H. Meyer and John Reid Jr., was responsible for the design of Exposition Auditorium (now Bill Graham Civic Auditorium) and served on the Advisory Board that oversaw implementation of the 1912 Civic Center Plan. The SEIR, and the Main Library/Asian

Art Museum Final EIR provide adequate information for evaluating the effects of the proposed project on the old Main Library building and the Civic Center. The following is provided for the reader's information.

John Galen Howard served on the committee charged with rebuilding San Francisco following the 1906 earthquake and fire; he was founder of the Department of Architecture at U.C. Berkeley and designed most of the then-new buildings on campus. Frederick H. Meyer founded the California College of Arts and Crafts in 1907 and, after serving on the Civic Center Advisory Board, was a member of the War Memorial Advisory Board, which was responsible for the Opera House and Veterans Building. John Reid Jr. was City Architect from 1912 to 1928. In addition to his service on the Civic Center Advisory Board and the design team for Exposition Auditorium, Reid completed the design of the Civic Center Plan, was adviser to the competition for the California State Building (350 McAllister Street), and designed many San Francisco schools, including the former High School of Commerce (now the school district headquarters) at 135 Van Ness Avenue. James D. Phelan was mayor of San Francisco from 1897 to 1902. He supported the Englishman B.J.S. Cahill, who put forth his original Civic Center Plan in 1899. After leaving office, Phelan continued to champion the Civic Center as head of the Society for the Improvement and Adornment of San Francisco, which in 1904 invited the noted urban planner Daniel Burnham to devise a city plan and asked Cahill to design a Civic Center. A modified version of Cahill's 1904 plan was ultimately adopted for the Civic Center, in 1912 (Corbett, 1974).

See also pp. 54-57 of the Main Library/Asian Art Museum Final EIR, which describes the history of Civic Center and some of the main participants in that development.

- FF-2) The study referred to by the commenter is intended to identify ways to improve pedestrian travel to and from the Civic Center BART/MUNI Metro station. The study, which is being undertaken by the San Francisco Planning Department and Department of Public Works, with funding from the San Francisco Transportation Authority, will focus on making street-level conditions around the station safer and cleaner, and will look at ways of enhancing directional signage between the BART/MUNI station and Civic Center attractions. Lighting improvements are also under consideration. Areas included in the study are Civic Center Plaza and surrounding streets and the proposed Fulton Street Mall (Fulton between Larkin and Hyde Streets, between the new Main Library and proposed Asian Art Museum). The study is part of a larger effort that also includes the Mid-Market Street area, including United Nations Plaza (Alfaro, 1998).

Comments GG

My name Enid Lim, and I am here to ask you to approve this SEIR. I also have – will talk about transportation. This area is very well served by transportation, as opposed to where the Asian Art Museum is now in Golden Gate Park. This will bring into the area many people who would find it difficult to get out to the Asian Art Museum and into the Park.

We have BART. We have MUNI, both east and west, north and south. We have the metro stations nearby. There is also a great deal of affordable parking in the area. This has not been really stressed in the EIR, because transportation, for a number of the people who will be visiting the museum, is going to be very important.

Many of the people who will be coming to the museum don't even drive, and they do depend on public transportation to get there. And this particular location has all the facilities for getting people to and from without having to bring in the ubiquitous automobile. (Enid Lim)

GG-1**Responses to Comments GG**

GG-1) The SEIR discusses effects on transit service on p. 79. Existing transit service is described in the Main Library/Asian Art Museum Final EIR on pp. 75-77; that text remains generally accurate. (The F-Market streetcar line that now operates on Market Street provides additional service beyond what was described in the FEIR.)

Comments HH

I am Sidney Kass. I am a docent at the Asian Art Museum. I urge you to support the SEIR.

We all know the saying "the squeaky wheel gets the grease." I hope that this Commission is not susceptible to that style of decision making. I urge the Commission to take the business-like, practical, hard-headed decisions that will result in the best treatment for the City's large and very valuable collection of Asian art.

HH-1

On reading the SEIR, my strongest proposal – and a part of that seemed rather weak and not clearly presented – is to allow the enlargement of the third floor so that the staff will have offices without having to take away from gallery space. As a docent, I lived through some recent changes at the present Asian Art Museum where gallery space was cut down because there was money to hire another curator, and the Southeast Asian collection got shrunk in its viewing space.

I am certain that such offices will eventually be built, but it will be far and more expensive to enlarge the third floor in the future than if it is done now as part of the remodeling. A good business decision would say: Let the third floor be enlarged to the limit not to make the building unattractive.

I also want orderly circulation of the public through the galleries. I have to confess, it is difficult for me to look at blueprints and visualize what the result will be. I suspect that is hard for most Commission members, too. Let us leave that to the architects and the museum staff. I hope you will allow the architect to do her professional work and give the city a building worthy of the wonderful collection. (Sidney Kass, Asian Art Museum docent)

HH-1
(cont'd.)

Responses to Comments HH

HH-1) The commenter is apparently referring to the project component that would convert the existing third floor of the old Main Library building to staff offices for the Asian Art Museum and a museum library, which is described on SEIR p. 40. Also, the potential future Phase 2 and Phase 3 expansion, described on p. 43, would include additional office space. The comments are noted.

Comments II

I am Judy Wilbur, Asian Art commissioner and trustee. I have been involved with the museum since being appointed by Mayor Moscone in 1976.

I feel that the SEIR needs to reflect the over ten years of strong support for this project and from its elected leadership, and I believe that you have all received a book containing some of the past letters of support.

I think – I would urge you to – of your speedy approval of the SEIR, and the reason being that the issues have been thoroughly discussed and rehashed time and time again by the Asian Art boards, and staff, appropriate city department personnel, and public, private and in the media for more than ten years. The delays have been extremely costly and time-consuming to all involved. And I would like to just quickly give you a bit of background to put this into perspective.

The Asian Art [Museum] early in its history began looking for a new home. However, the first serious and realistic proposal occurred with the Civic Center Plan drafted by Mayor Feinstein and approved by the Board of Supervisors in 1987. The idea was that – the plan being for the Asian Art Museum to move to the old Main Library when the library moved to the new Marshall Square.

The City, early on, recognized that they needed a tenant, a tenant who could not only finance the project, maintain the historical aspect of the building while changing the use so that it became a functional building, add to the mix of the Civic Center activity and preferably be owned by the City.

Other alternate choices would have left an empty building at the heart of the city. The issue of the interior aspects first began to heat up before this very Planning Commission in 1992, when the Asian Art [Museum] was trying to determine the realistic cost of the seismic upgrade for the 1993 bond measure through the extensive study of Rutherford and [Chekene]. This board did recommend the murals not be included initially in the Civic Center Plan [Historic District] because of seismic safety and human safety.

Again, I urge you strongly to support this study. (Judy Wilbur, member, Asian Art Commission; trustee, Asian Art Museum)

II-1

Responses to Comments II

II-1) The commenter's support for the project is noted; no response is required.

Comments JJ

My name is Jim Brady. I am a long-time resident of San Francisco, a voluntary docent at the Asian Art Museum for over 20 years.

I think the SEIR is adequate and gives a very good sort of document about the proposals of the Asian Art Museum. When I look around Civic Center, I think it is time to move forward. We have the new City Hall. We can now see the statue on top of the dome there gleaming in gold, the new state office building on the side. Yet, if we look across, what do you see? A fenced-in, old building, the old lady, the old library.

The Asian Art Museum will now bring that into historical – will take the historical path and bring it up to the current needs.

The SEIR does address the importance of the design in the Asian Art Museum. It keeps the outside of the building basically intact. It does some structural changes in the center. You know, structural changes are required for the sort of safety of the collection. There is a four billion dollar collection that is coming in. The building needs to be retrofitted. It is important that the building be retrofitted.

JJ-1

During construction around the Civic Center, at the Opera House, in the – what do you call it? The civil – City Hall itself, there have been fires. Fires have destroyed many of the different things that were in the building. I think it is important that we look at this aspect and think that these Piazzoni paintings must be removed even if the construction is going on. How often are old structures completely destroyed just because retrofitting or some changes going on?

We can only look around the Bay Area. Look at San Rafael and Dominican College, how they lost their buildings over there because of the retrofitting.

When we look at the Civic Center area, we look at various buildings. We look at the Church of Christ, the symphony and the box office. We look at the Art Commission. We look at the Art Commission's lot. We go across the way. We look at the Power House. We are looking at the Abigail Hotel. We look at various buildings; they all compose this Civic Center.

The Asian Art Museum will be a good choice for this Civic Center. (Jim Brady, Asian Art Museum docent)

Responses to Comments JJ

JJ-1) The commenter's support for the project is noted; no response is required.

Regarding potential fire damage to the Piazzoni murals if left in place during construction, the report by conservator Constance Silver (1997), cited in the SEIR on p. 56, includes an appendix

that outlines "Protection of the Piazzoni Murals in Place." Among the recommendations is fireproofing of the panels that would be placed over each mural.

Comments KK

I am also a docent at the Asian Art Museum.

I wanted to address two specific supposed problems with the SEIR. I want to urge you to adopt it.

The first problem has to do with the numbers of students who come to the Asian Art Museum in its present location and our inability to deal with them. This past year 75 docents gave tours to 5,984 students. We have one classroom to deal with these students. We clearly need the new space that will be ours in the Civic Center.

The other point I wanted to address is that question of whether there had been sufficient expertise of people responsible for Asian art in the input of this plan. Not only have our own curators, conservators, librarians had input into how the space should be used, but Asian art specialists whom we have consulted around the world have had input.

And, lastly, I would like to point out that Asian art in Asia is very often beautifully shown in Beaux Arts buildings, and I would hope you would consider this. (Sally Kirby, Asian Art Museum docent)

KK-1

Responses to Comments KK

KK-1) The commenter's support for the project is noted; no response is required.

Comments LL

My name is Wai Ching Kwan. I am speaking on behalf of the Chinese Community Development Center.

We are strongly supportive of the Asian Art Museum's current plans to transform the old Main Library into a new, world-class Asian Art Museum. The new Asian Art Museum will help revitalize the Civic Center area. If the Asian Art Museum is not allowed to adopt the space it needs, we feel it will be difficult to find a new tenant for that building and it will be left vacant and deteriorating.

The new Asian Art Museum offers many benefits to the community in terms of cultural, educational, and economic and vitality. The new location at the Civic Center makes transit access much more convenient to our Chinatown seniors and families to visit the museum.

The proposed adaptive views of the museum will also provide more community spaces such as classrooms and meeting spaces – benefits to the community. We applaud the Asian Art Museum's efforts to provide increasing community awareness programs and events to ensure that all segments of the population will benefit from its programs.

Therefore, we urge the Planning Commission to accept the supplemental EIR as it is. (Wai Ching Kwan)

LL-1

Responses to Comments LL

LL-1) The commenter's support for the project is noted; no response is required.

Regarding potential deterioration of the old Main Library building if not occupied by the Asian Art Museum, please see the response to Comment F-28, p. C&R.59.

Comments MM

My name is Colette Tanaka, and I am a collections manager in the Bay Area.

I have looked forward to seeing the Asian Art Museum in its new home in the historic Civic Center complex. The old Main would be a wonderful showcase for its renowned collection of Asian art. The seismic upgrading and the remodeling of the building to meet the museum's climate-control needs already presents daunting, but necessary, undertakings.

However, it is in the area of design, elements of the design, or aesthetic motivations that the project threatens the historic and aesthetic fabric of the old Main, and thus undermines the Planning Commission's own planning code, Article 10. For this reason, I feel the DSEIR needs to address the more critical issues.

First, further information needs to address the radical changes in the interior light levels. The proposed project seeks to create light-filled spaces, quote, a skylight and piazza that wraps around the grand staircase, end quote.

This singular design criteria mandates the demolition and/or removal of very significant artistic and historic material from the old Main. The increase in light levels is a significant and controversial issue in considering the mitigating actions installed at other Gae Aulenti designs. For example, in the Palazzo Grassi in Venice, here, as in the proposed project, the galleries open on to a skylighted courtyard. To mitigate against natural light, the gallery arcades that face the central court have to be heavily curtained to protect light-sensitive objects.

It should also be noted that the skylights also create a greenhouse effect. During even cool falls and winter weather, the interior of Palazzo Grassi remains uncomfortably warm and noticeably humid.

How will the museum mitigate against increased light levels? To use curtains or screens, as in the Palazzo Grassi, (unintelligible). Further, in removing very significant and historic material just to replace it with interior temporary materials.

Just in closing, I think you also need to have an illustration of what that view is from the north, south galleries vistas, included in the document. (Collette Tanaka, [art] collections manager)

MM-1

Responses to Comments MM

MM-1) Please see the responses to Comment Letter L, from the same commenter; that letter appears on p. C&R.115.

Comments NN

My name is Craig Addelman. I represent the Tenderloin Neighborhood Development Corporation. We own and operate fifteen properties in and around the Tenderloin and surrounding Civic Center areas, including two buildings directly across the street from the proposed site, 150 to 160 McAllister Street.

I am here to request that the draft SEIR better reflect the strong support of the Tenderloin community for the Asian Art Museum project. The legitimate points regarding the preservation of architectural significance within the existing opening library are important, but while TNDC also works to preserve architectural integrity in the neighborhood, we must balance that worthy cause with the broader needs of the community. And I feel that the Asian Art Museum represents the tremendous resource for the Tenderloin community and San Francisco as a whole. And the significance of the cultural, economic and architectural additions to the community, I think, outweigh many of the architectural preservation points that are raised in the SEIR.

NN-1

So, again, I wanted to express our organization's and the community's support as a whole for the project. (Craig Addelman, Tenderloin Neighborhood Development Corporation)

Responses to Comments NN

NN-1) The commenter's support for the project, in relation to the Tenderloin community, is noted; no response is required.

Comments OO

My name is Sox Kitashima. I also am a member of the Advisory Council of the Commission on Aging, in which it makes me want to be able to promote anything that would help the elderly people make things more accessible to them, especially going into the Golden Gate Park is a very traumatic thing for the older people who do not drive.

We found recently in doing the Bruce Lee 25th anniversary there at the Asian Art Museum, we found that it was hard to sell tickets to older people who were afraid to get out there because you can't get a cab out there, for one thing. Even the common carriers are not close enough to make it safe for them. I even find it very difficult for myself.

OO-1

I belong to the board of directors of the Asian American Arts Foundation in which we began in 1994. This organization is to promote, to assist the aspiring young artists, and we are interested in getting the young people out there. And in doing this movie the other day on Bruce Lee, we tried to get the young Scout members to be ushers there, but we find it was very difficult, and none of the boys own a car. Their parents were not interested in coming.

So what they did was they came earlier when it was light on the bus, and they could walk a few blocks, okay, but their parents had to come and pick them up at 9:30 at night because the transportation is very poor.

I still believe the place lacks cultural facilities, and it is not accessible, it is not affordable, and it is not well equipped. I feel it is not functional. We need a place where we could have reception, but there is not even a sink there that we could use.

OO-1
(cont'd.)

So, anyway, I would like to see this move for the SEIR, that the project be certified for the next step, and then I would like to see it be expedited as soon as possible. I think it is very important for all ages of people. (Sox Kitashima)

Responses to Comments OO

OO-1) The commenter's support for the project is noted; no response is required. See Comment Letter M, p. C&R.111, for written comments from the same commenter.

Please see the response to Comment GG-1, p. C&R.129, regarding transit service.

Comments PP

My name is Mary Anne Miller. I am a member of the board of San Francisco Tomorrow. I am speaking strictly about the EIR, and I do not have a position pro or con. I just want this document to be the best possible one for public information.

I find that the graphics are absolutely abysmal. The information on the plans have no key so that you can understand which walls remain and which are to be removed. The architect's renderings of the proposal are the only interior views that we have in a document, which is supposed to be reviewing the interior modifications mainly that are made here to one of the three buildings in this city that is actually landmarked as to the interior. In other words, the interiors are considered extremely significant, and it is one of three – do you want to know what the other two are? The City Hall rotunda and the Garden Court of the Stanford – sorry, the Sheraton Palace.

PP-1

So this is one of the three. Yet, we have not a single photograph of the interiors. We have no drawings of elevations of the interiors that will remain. How can I be assured when they say the entire loggia will be retained, or the entire columns will be retained? Or the entire grand staircase will be retained? What does that mean? You do not have anything here to allow you to evaluate whether that is going to permit a decision, a proper decision when you do decide on this project.

I had to look with the assistance of Ms. Roos into the appendix to find some very badly shaded floor plans of the existing floor, and they are shaded so you cannot even tell what the rooms are.

Then I want to take you to the graph – and I'm rushing because it is suddenly two minutes that we have to speak.

The chart on Page 63 is really shocking because wherever you see an evaluation here – this should be to help you in your decision. Under Article 10 you have some checkmarks. That is one way of producing a chart. Then you have under the Page & Turnbull things like "Zone 1," "Zone 2," "Zone 3."

PP-2

Under Carey & Company you have “significant,” “very significant,” all together different words to express in fact the same thing.

That impacts running along here, “very significant,” “exceptionally significant,” “very significant.” Zone 1 is “very significant.” Shouldn’t it say “very significant,” “very significant?”

PP-2
(cont’d.)

This is an entirely wrong way to present information to the public.

I really – you know, I would like to want this Asian Art Museum. I adore the collection. I want it to have a good home, but it is not going to have a good home if we don’t see to it through documents like this. (Mary Anne Miller, board member, San Francisco Tomorrow)

Responses to Comments PP

PP-1) As stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, a number of figures have been added to the SEIR, including more legible plans of the existing old Main Library building, “before and after” interior elevations of Rooms 201 and 210, the main second floor reading rooms; interior photographs of Article 10 interior features proposed for alteration; an additional rendering; and interior photosimulations of the main reading rooms converted to two stories of galleries, the second floor loggia with the Piazzoni murals removed, the main stair, and main entry hall. The new figures [presented in Section F of the published Draft Summary of Comments and Responses] are incorporated within the text of this FSEIR, as indicated in the Table of Contents, or included in Appendix A.

For clarification, the old Main Library building is not designated a City landmark. As noted in the SEIR, it is a Contributory building in the Civic Center Historic District, listed in Article 10 of the Planning Code; and within a National Historic Landmark District and a historic district listed in the National Register of Historic Places. As stated on SEIR p. 51, Appendix J of Article 10 identifies several Exceptionally Significant Interior Spaces in the old Main Library building, alteration of which requires issuance by the City Planning Commission of a Certificate of Appropriateness. Appendix J also identifies Exceptionally Significant Interior Spaces in City Hall and the Department of Public Health Building. Separately under Article 10, City Hall, including parts of its interior, and the Palace Hotel (including the Garden Court) are designated City landmarks.

PP-2) The SEIR presents the categories used in the two evaluations of the old Main Library building’s interior features. The SEIR includes on p. 57 a detailed explanation of the two separate rating systems used by the project’s preservation architect (Page & Turnbull), which prepared the Historic Structure Report, and another preservation architect (Carey & Co.), which prepared an earlier Building Evaluation Report. This explanation is summarized in the notes at the bottom of both pages of Table 3, pp. 63-64. As indicated in the notes in Table 3, the check mark (√) denotes listing as an Exceptionally Significant Interior Space in Article 10.

As discussed in this Summary of Comments and Responses, the SEIR identifies Exceptionally Significant Interior Spaces, and project impacts on these spaces, in the SEIR text, in Table 3, and in plan view figures.

Comments QQ

My name is Winchell Hayward. I am a long-time resident of San Francisco. I am here to represent the California Heritage Council.

We have written a rather lengthy letter here, which I'm going to give now to your secretary, Ms. Avery, and ask that she pass it out to the commissioners to read at your leisure. I do not have time to cover all the points I have made in this letter, so I will except myself for a moment to give it to Ms. Avery.

The California Heritage Council urges you not to approve this SEIR because we feel that there are a number of significant deficiencies which the previous speakers have already detailed. We are opposed, basically, to the project because of the fact, primarily, that either of these alternatives is making massive changes in the building. So-called Alternative C is even worse than Alternative B.

We urge that you, if you finally accept the SEIR, that you vote for Alternative A, no project, and also that you recommend -- that you do not issue a certificate of appropriateness for this project.

There are other ways to get this project done. We feel you should not, in effect, to use a vernacular, mess up the Main Library. There is too much work to be done.

Another thing, too, and that is the SEIR does not address how long the Asian Arts Museum is either in perpetuity nor a certain length of time. I think this is really not part of the SEIR, but I think taxpayers are going to want to know if they are going to plunk down a lot of money, or how long is the perspective tenant going to be there, are they going to pay for rent, operation, and maintenance?

Again, that is not an SEIR, but it is pertinent to the whole project. I would think the SEIR should address pertinent points, not just the building. Although, it is so important.

I want to point out, too, that the New Main Library is already complaining that, "We don't have enough room." What could be more logical than to use the old Main Library as an auxiliary library? They need the space.

There is a lot of other things.

Also, too, you are going to have continued, and I say, permanent disharmony, because you have a (unintelligible) to the outside, which unless you really mess up the outside, which is not too bad. But they are putting some extensions on Fulton and McAllister Street, which really contrast starkly with the exterior of the existing building.

And there is -- I don't have time to do. I will simply wrap up by saying if you look on Page 3 of the letter that you are going to get, you will see a lot of the policies and endorsements. The City's General Plan are being clearcut violated, and we ask that you take a strong look at this.

Also, the other points that I made in this letter, which I would like to cover but I don't have time. (Winchell Hayward, California Heritage Council)

QQ-1

Responses to Comments QQ

QQ-1) Please see the responses to Comment Letter I, from the same commenter, which raises the same points. This letter appears on p. C&R.84.

Comments RR

When I see things like large posters on Market Street kiosks already advertising the new Asian Art Museum showing its new [mansard] roof which has yet not been approved, I have to wonder if this is not a fait accompli and we are wasting a lot of time and effort here.

But I have been going to meetings over the last 30 years, meetings like this one, in the fervent hope as much as I get discouraged that commissioners, such as yourselves, take all these things into consideration no matter what the issues are.

As you hear proponents extolling the glories of the Asian Art Museum – and I happen to think that one of the most glorious things about it is its current setting in Golden Gate Park. I wish there had been some way to expand and upgrade there. Please remember what it means for the old Main Library. This is one of the original buildings of the 1912 Civic Center Plan. No other building around the plaza has been altered in the way this one is proposed to be altered.

RR-1

The Civic Auditorium was altered in the 1960s, and the auditorium itself before we had the concern for historical preservation that I hope we all have today – City Hall, all the public spaces that are significant are being restored. Some are being brought back to their former glory. How can we allow this to happen to the old Main Library no matter what the cost?

But just to bring up a couple of specifics regarding the SEIR. When you look at the graphic of the elevation of the building with the proposed new hipped roof, or [mansard] roof, designed to cover the new mechanical HVAC systems on top, this is not even mentioned in this entire SEIR that this would not be compatible with the new Main Library. It mentions, oh, it would be compatible with the War Memorial Building, like we are in right now, like the old state building. But there is no mention to the New Main Library, which was specifically designed by its architect to fill the same envelope of space as the old Main Library, which meant a flat roof.

You are going to have total asymmetry there when you have the [mansard] roof on the old Library and retain the flat roof on the new library, and I know there is no proposal to make any changes there. This is a very stark impact on the environment, not even mentioned there; it needs to be mentioned.

And one more thing that was previously brought up. The graphics are sadly lacking as far as interior views, the way those large reading rooms are going to be cut up by new floors. We have to have a look at this and see what it really means, and you have to really consider what this old library is historically and architecturally before anything happens to it. (Michael Levin)

Responses to Comments RR

RR-1) Regarding the comment about the compatibility of the project design with the new Main Library, please see new Figure 10D, SEIR p. 60b, illustrating the two buildings side-by-side. It should be

noted that the new Main Library, because of its recent construction, is a Noncontributory building within the local and national Civic Center historic districts. Non-compatibility with a noncontributory structure would not be considered significant under CEQA, although this may be a valid issue for the project approval process. However, as stated in the response to Comment A-4, p. C&R.14, based on comments from the National Park Service (NPS) and the State Historic Preservation Officer (SHPO), the SEIR has been revised to include their opinion that the significant, unavoidable adverse effect on historic architectural resources (the old Main Library building) would encompass effects on the National Register-listed and local historic districts as well. Please see also the response to Comment F-3, p. C&R.49, regarding the penthouse for additional discussion of effects on the historic districts.

Comments SS

My name is Baoyan Chan. I represent community organization. We are strongly for you, the Commission, to accept the EIR for the New Asian Art Museum, the project. We feel that – we hope that you will do certification of appropriateness of the project because there would be many benefits to the whole city, county and, also San Francisco can move forward the schedule, especially for Chinatown residents, families and children.

As a resident of Chinatown, San Francisco Chinatown, we cherish our diversity cultures in San Francisco, and we value the beautification of our heritage such as represented by Asian Art Museum.

Also it would be very meaningful for us to have a fine art Museum reflect our Asian heritage at the Civic Center.

We are looking forward to reconvert the old Main Library and also the capacity – the capacity to house exhibits and the huge collection of the Asian Art Museum. (Baoyan Chan)

SS-1

Responses to Comments SS

SS-1) The commenter's support for the project is noted; no response is required.

Comments TT

I need to preface my remarks by saying that I very, very much love the Asian Art Museum and I frequent it very often. I love the programming there. I am a very, very – I really love having it in the City. I think it is probably our best cultural institution when you take it overall.

I also need to say that I am very happy that the Asian Art Museum is moving into the Civic Center area, and I don't think there is any question about that. The voters, and it was my enthusiastic vote going along with that, voted the bond money for the museum to move there.

TT-1

With that said, I need to say that I think, perhaps, some of the people who are urging us to adopt this SEIR as it is currently written may be being fairly short-sighted. We are going to need to use this document to make some very important decisions, and the museum is asking the Landmarks Board, the Planning Commission, and probably eventually the Board of Supervisors to make some very, very important decisions with regard to the issues of architectural and historic significance in that building.

It has designated in it by law significant interior spaces that are being drastically altered by the preferred plan for the museum. There needs to be, in my mind, when this issue of the certificate of appropriateness comes before us as decision makers, good justifications for violating Secretary of Interior standards with regard to those significant interior spaces that are designated by law.

I need to have, as a decision maker, something before me and a record, a document, that gives me the legal handle to be able to make those decisions, if they are appropriate. I believe that this document is sorely lacking in justifications for the kinds of significant impacts that the Asian Art Museum is asking us to impose upon a very, very significant building.

Some of the spaces in this building – and I don't even refer to the murals. There are spaces in this building that are extraordinarily unique, extraordinarily beautiful, extraordinarily significant historically, architectural features that will never be repeated again in the future, things that come from a period of time that it will not be repeated again and we can – we cannot recapture at any point. Once we have destroyed them, they are gone forever.

TT-1
(cont'd.)

In order to be able to justify that in my mind we need to have an environmental review document that is strong, that has good solid justifications for the things that the project alternatives that are being proposed and that is legally justifiable, substantially provides the substantial legal basis for the decisions that we're going to be asked to make on the certificate of appropriateness.

I believe that the document is not able – as it currently stands, I cannot in my own mind see the justifications for some of the things that are being asked. And since we – this body and other bodies are going to be the decision makers regarding this, we need to be presented with adequate information to be able to make those decisions.

I am particularly impressed by the letter from Dan Reidy on behalf of the Landmarks Board because they are the initial body that is going to have to make these decisions with regard to the certificate of appropriateness. They feel in making that decision that they need a lot more information, and they need a lot more adequate document, that they – our experts that are going to be advising us on the certificate of appropriateness are telling us that they don't have sufficient information, that this document is inadequate for their purposes in making the kinds of decisions that you are asking them to make.

So I would, rather than go into detail, I am very impressed by Daniel Reidy's letter on behalf of the Landmarks Board, and I had many of the very same questions myself. I have a particular interest in the reading rooms. I think they are just incredible spaces that are really under attack by this plan, and I need to have, in my mind, something very strong to be able to justify what's being asked.

So, please, I think don't so lightly say that you want us to approve this document as is, because then you may be haunted about the inability of the document to justify what you want us to do. I think all of us involved in this ought to think very long and hard about that particular question. (Dennis Antenore, member, San Francisco Planning Commission)

TT-1
(cont'd.)

Responses to Comments TT

TT-1) As stated in the response to Comment J-7, p. C&R.83, the decision-makers, acting on the whole of the record, will determine whether to grant approvals for the project. The entirety of the record may include the SEIR, the Main Library/Asian Art Museum Final EIR, the 1996 FEIR Addendum, the project sponsor's application for a Certificate of Appropriateness, and other information presented by the project sponsor as well as project proponents and project opponents. The environmental review materials noted above provide information and support for their conclusions, in accordance with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

It is for the sponsor to justify alterations to the historic architectural fabric of the old Main Library building in order that the Planning Commission may grant a Certificate of Appropriateness. This is not the function of the SEIR. CEQA Section 21002.1(a) states, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." The SEIR identifies and evaluates each, in accordance with CEQA.

The SEIR also includes a statement of the project sponsor's objectives, as required by Section 15124 of the State CEQA Guidelines.

As stated in the response to Comment L-3, p. C&R.103, it is for the decision-makers to determine whether the project or an alternative is more appropriate, based on the entire record before them. The decision-makers may request further information, including more detailed information about proposed alterations, from the project sponsor. The decision-makers could also require that certain components of one or more alternatives be incorporated into the project, as long as those components were adequately analyzed in the Main Library/Asian Art Museum FEIR and the SEIR. As stated previously, the project sponsor (and others) will have the opportunity to present additional, more detailed information concerning the project to the decision-makers during their consideration of project approval.

Regarding comments from Mr. Reidy of the Landmarks Board, please see the responses to Comment Letter E, which appears on p. C&R.35.

Comments UU

I, too, want to preface my comments along the same line as Commissioner Antenore, but I want to put a different spin on it, or rephrase it in a way that might ask those of you – particularly those of who you came up here and asked for us to certify the EIR as is and you are all in favor of the Asian Art Museum, and you don't want any delays and you want to move forward along the lines you express to propose.

It is in your best interest, and in everybody's best interests, that the EIR be as complete, as thorough, and as objective and accurate as possible. So that is the spirit of what I am going to say. And I want all of you to understand, as you probably do by now, we are not going to decide anything today. We are just putting together as complete a record as we can to have an accurate, complete, and objective EIR.

I, too, agree with Commissioner Antenore that Mr. Reidy's letter of August 17th is helpful. I agree with certain parts of it, and I will specify which parts I agree with. I disagree with other parts. The parts I disagree with, I disagree with because I think the EIR does the job – the draft supplemental environmental impact report does the job it is supposed to do, and I take issue with the need for further clarification or different spin or something. So I won't even go into the parts I disagree with. But I will enumerate a couple of the areas in which I agree. I think the document needs to be more complete, particularly complete. It is not a question of inaccurate or not being objective, but it is just sort of short in certain respects.

UU-1

The areas in which I agree are particularly with respect to the reading rooms. I went on a site inspection of the project, and that was very helpful and I learned a lot. It enabled me to visualize what's going to be done, and it is very exciting in many respects. If I had not gone on the site inspection, I would have been at a loss to understand by only reading the SEIR what is being proposed and what the environmental impacts of that are.

I think the reading rooms are the most important area where we need to have a rendering of what they look like now and how they will look when the additional floor is added, what the heights will be, what the visitors' perspective will be with respect to the objects being viewed. I think that really needs to be visualized in a report, and not just written as it is now.

The issue of the statues on the Larkin Street facade, it takes as a given they are going to be removed, but without saying what the reasons for it are. I don't know if they are in need of repair, or if it has been decided that they are too Eurocentric for an Asian Museum, or some other reason. But there is no elaboration of why that particular external feature is going to be changed. I think that needs to be addressed.

The moat, which I understand to be mostly functional, there's a comment made in Mr. Reidy's letter that there is no discussion of the aesthetic effect of that on the historic district. I think that can be fleshed out a little bit more.

And the – with the issue of the murals. There are two sets of murals at issue here, as I understand it, the Piazzoni murals, which we have heard so much about, but there are the two DuMond murals that are also proposed for removal. There is not much of a discussion of the DuMond murals and whether they are significant, historically significant or not, and why they are being proposed for removal, or any visualization of that. There is some discussion of the Piazzoni murals and the exciting things that are going to be put in their place instead, which I think is good. But I think there should be some more elaboration and visualization of the DuMond mural removal aspect.

UU-1
(cont'd.)

So those are the elements of the letter I agree with, and I think there should be more discussion of it in the final report that will come before us at a later date for certification. (Richard Hills, member, San Francisco Planning Commission)

Responses to Comments UU

UU-1) Regarding the two-story reading rooms on the second floor, as stated in the General Response Regarding the Level of Detail in the Draft SEIR, p. C&R.5, figures have been added to the SEIR, depicting “before and after” interior elevations of Rooms 201 and 210, the main second floor reading rooms; interior photographs of Article 10 interior features proposed for alteration; and photosimulations the main reading rooms converted to two stories of galleries. The new figures [presented in Section F of the published Draft Summary of Comments and Responses] are incorporated within the text of this FSEIR, as indicated in the Table of Contents, or included in Appendix A.

Regarding the Lentelli sculptures above the Larkin Street entrance, please see the response to Comment F-16, p. C&R.56.

Regarding the seismic moat, please see the response to Comment B-2, p. C&R.24.

Regarding the DuMond murals, please see the response to Comment F-7, p. C&R.52.

REFERENCES - PUBLIC HEARING COMMENTS

Except where noted, the materials referenced in this SEIR are on file and available for review at the San Francisco Planning Department, 1660 Mission Street, 5th Floor, as part of project file No. 97.750E.

Alfaro, Jorge, San Francisco Department of Public Works, telephone conversation with Environmental Science Associates, September 1998.

Corbett, Michael, Nomination form for National Register of Historic Places. December 2, 1974.

Silver, Constance S., art conservator, “The Piazzoni Murals Review Panel Report” This report was prepared in response to the Board of Supervisors’ creation of a Piazzoni Murals Review Panel. Ms. Silver was selected for the panel by the “Committee to Retain the Piazzoni Murals.” July 25, 1997

SECTION E

STAFF-INITIATED TEXT CHANGES AND ERRATA

On p. 6, the second sentence under "Historic Architectural Resources" is revised for clarity regarding changes to the second floor loggia and inscriptions in the interior of the building, as follows (new language is underlined; deleted language is indicated with ~~striketrough~~; see the similar change made to p. 65, below):

The project would include demolition of the panels in the outer walls of the second-floor loggia that contain the Piazzoni murals, and removal of the Piazzoni murals, retaining ~~only other wall elements including the columns,~~ wall base and entablature (including inscriptions) and constructing new columns; demolition of ground floor elevator lobbies; ~~removal of the Piazzoni murals from the loggia;~~ construction of a new floor level within the second-story reading rooms; partial demolition of the north wall of the Fulton Street reading room by construction of large openings at the second and new third floors; and demolition of north and south portions of the east wall of the Larkin Street reading room; as well as demolition of other spaces identified in building survey reports as having historic architectural merit.

On p. 17, the second sentence of the last paragraph is revised for clarity as follows (new language is underlined; deleted language is indicated with ~~striketrough~~; see the similar change made to p. 109, below):

Notably, and in contrast to the proposed project, this alternative would retain intact the second floor stair loggia walls that support,~~including~~ the Piazzoni murals in Room 290, and would not install a new full floor level in the second floor reading rooms; mezzanines and/or self-contained structures within these ~~large~~ double-height spaces would have less effect on a viewer's perception of these monumental spaces than the full floor level, and could be removed in the future relatively easily.

Figures 3, 4, and 5, pp. 31, 32, and 33, have been revised to depict the Chinese Garden at the east end of the Fulton Street elevation as being surrounded by a stone wall, rather than a metal fence. [The revised figures were presented in Section F of the published Draft Summary of Comments and Responses.]

On p. 35, the last sentence of the first paragraph under "Interior Alterations" is revised as follows to clarify that only the two large second floor reading rooms have decorative beamed ceilings, which would be retained in each case; the three smaller corner rooms have plaster ceilings that would be demolished and replaced (new language is underlined):

The existing decorative beamed ceilings in the two large reading rooms would be retained and protected during construction.

On p. 36, the fourth full sentence of the first bulleted paragraph is revised as follows (new language is underlined):

The Central Court would also be open to the Monumental Staircase with removal, from the loggia (balcony) at the top of the staircase, of the non-structural walls panels (and steel columns within the walls) supporting the existing Gottardo Piazzoni murals; the wall base and entablature in the loggia (including inscriptions) would be retained, and new structural columns would be added.

On p. 36, the following is added to the end of the last paragraph to reference Figures 8A through 8D, which are added as pp. 39a-39d:

Figures 8A through 8D, pp. 39a-39d, present existing and proposed interior elevations of the west and south second floor reading rooms (Rooms 201 and 210).

On p. 40, the first sentence of the last paragraph is revised as follows, and a new Figure 9A is added to p. 41a (new language is underlined):

Figures 9 and 9A depicts architect's renderings of interior views through the proposed Central Court along the length of the old Main Library building.

On p. 43, the second sentence of the first paragraph under "Expansion Space" is revised as follows to clarify the description of Phase 2 of the museum's proposed program (new language is underlined):

This Phase 2 expansion space would be a three-story addition to the building atop the currently proposed expansion of the lower level (basement) with a 400-seat auditorium/theater⁸ and two levels containing about 16,500 sq. ft. of museum gallery and office space and about 4,000 sq. ft. of service space for the auditorium (dressing rooms, control room, storage, etc.).

On p. 50, the third sentence is revised as follows to clarify that some information in the Main Library/Asian Art Museum FEIR remains valid (new language is underlined; deleted language is indicated with ~~striketrough~~):

The impacts analysis contained herein ~~replaces~~ supplements and updates the analysis of impacts to historic architectural resources in the FEIR.

On p. 55, the second sentence under "Interior Features" is revised as follows to correct two room numbers that were interchanged (new language is underlined; deleted language is indicated with ~~striketrough~~):

Once inside the Larkin Street doorway, the interior plan is in the form of a progression of ceremonial spaces, a "parti" characteristic of the Beaux Arts style, from the Main Entrance Lobby (Room 101 ~~191~~) and Vestibule (Room 191 ~~101~~), into a north-south corridor (Room 190), up the ceremonial Monumental Staircase (Stair

⁸ As noted previously, the Asian Art Museum project as described in the *Main Library/Asian Art Museum FEIR* also assumed a 400-seat auditorium.

S101) flanked by the stair loggia, or balcony (Room 290), and into the 42-foot-tall Great Hall (Room 200) on the second floor.

On p. 55, in the third paragraph under "Interior Features," the second sentence is revised as follows (new language is underlined):

On the walls of the two reading rooms are 12-foot-high canvas murals by Frank DuMond that were originally exhibited at the Panama Pacific International Exposition in 1915 (see Figure A-12, Appendix A).

The second and third sentences of the first full paragraph on SEIR p. 56 are revised as follows to accommodate two illustrations of the Piazzoni murals (added as pp. 56a and 56b) and to correct the names of the four Piazzoni murals on the east wall of the second floor stair loggia (new language is underlined):

Each of the five sets of panels essentially forms one image, and may be viewed from close range and from the opposite balcony (see Figures 10A and 10B, pp. 56a and 56b; additional illustrations of the Piazzoni murals may be found in Appendix A). Four additional later panels, depicting "The Mountain," "The Forest," "Night," and "Dawn," were painted between 1933 and 1945 and stored in the basement of the library building until 1975, when they were installed at the east corners of the balcony, at the top of the staircase.

The last sentence of the third full paragraph on DSEIR p. 56 is revised as follows to clarify the entities that commissioned conservation reports on the Piazzoni murals prepared in 1996 and 1997 (new language is underlined; deleted language is indicated with ~~striketrough~~):

Two ~~Three~~ other conservation reports (~~Rosenthal, 1996~~, Alkons, 1997; Branchick, 1997) were commissioned earlier by the Asian Art Museum, and one (Rosenthal, 1996), by the museum and the San Francisco Art Commission.

On p. 60, the following is added to the end of the first paragraph under "Exterior Changes," and Figures 10C and 10D are added as pp. 60a and 60b:

Figure 10C presents an architect's rendering of the Larkin Street facade, and Figure 10D, p. 60b, shows a visual simulation of the proposed project and the New Main Library across Fulton Street.

The second sentence of the first full paragraph on DSEIR p. 65 is revised as follows to clarify that only the two large second floor reading rooms have decorative beamed ceilings, which would be retained in each case; the three smaller corner rooms have plaster ceilings that would be demolished and replaced (new language is underlined; deleted language is indicated with ~~striketrough~~):

The decorative beamed ceilings in ~~these~~ the two large rooms would be preserved, and certain trim and finish materials would also be retained, where feasible; bookshelves would be removed, and other finish materials would be replaced or eliminated.

At the end of the fourth sentence of the first full paragraph on DSEIR p. 65, a reference is added to Figures 10E and 10F, which are added as pp. 65a and 65b.

On p. 65, the first sentence under "Second Floor Stair Loggia and Murals" is revised as follows to clarify that the only demolition would involve the unreinforced masonry panels on which the Piazzoni murals are mounted (after removal of the murals). Existing decorative (non-structural) columns between these panels would remain, as would the floor and ceiling. As noted in the Draft SEIR, the wall base and entablature (including inscriptions) and the columns flanking the Monumental Staircase also would be retained, while the entire east wall would be demolished (new language is underlined; deleted language is indicated with ~~strikethrough~~):

On the second floor, the panels in the unreinforced masonry outer walls that contain the Piazzoni murals in of Balcony 290 (stair loggia), an Exceptionally Significant Interior Space, would be demolished, as would the east wall of the loggia (see Seismic Upgrade, p. 60). ~~on both sides of the Monumental Staircase, retaining only~~ The project would retain the existing decorative, non-structural columns between the panels, the wall base and the entablature above, including inscriptions, and ~~constructing new columns~~ New structural columns would be added (the existing inner columns flanking the Monumental Staircase would remain as at present, as would the floor and ceiling).

A similar change is made in both Table 2, p. 27, and Table 3, p. 63, to clarify that the existing decorative columns and other elements in the loggia would remain, while the outer wall panels containing the Piazzoni murals and the east wall would be demolished.

Table 2:

Main Stair Hall [Loggia] (290)	Retain	Demolish walls <u>panels containing Piazzoni murals, remove murals; except retain columns, base and entablature; add new columns; retain inner columns, floor, and ceiling; demolish east wall</u>
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Table 3:

Main Stair Hall [Loggia] (290)	√	^b	Very Significant	Demolish walls <u>panels containing Piazzoni murals, remove murals; retain columns, base and entablature; install new columns; retain inner columns, floor, and ceiling; demolish east wall</u>
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On p. 66, in the first paragraph, a reference to Figure 9A is added to the reference to Figure 9 in the last sentence and a new last sentence is added as follows (Figures 11A and 11B are added as indicated):

Figures 11A and 11B, pp. 67a and 67b, present visual simulations showing the proposed loggia.

On p. 68, the following is added immediately after the indented paragraph at the top of the page to describe differing opinions concerning removal of the Piazzoni murals prior to construction:

The conservator selected by the Asian Art Museum to serve on the Board of Supervisors' review panel has stated that "the murals must be removed for their safety and cannot be preserved *in situ* during construction." Reasons cited include the loss of environmental protection once the exterior walls are removed; potential impacts on the travertine walls due to vibration required for demolition of the brick exterior walls; and potential damage to the murals during the installation of seismic bracing, if the murals were retained in place during the construction (Huston, 1997).

On p. 69, a reference to Figure 11C is added in the parenthetical reference to Room 101, in the second paragraph under "Other Exceptionally Significant Interior Spaces," and Figure 11C is added as p. 69a.

On p. 69, the first sentence under "Expansion Space" is revised as follows to clarify the description of Phase 2 of the museum's proposed program (new language is underlined):

Subject to funding, construction of the proposed auditorium/theater, with two stories of additional museum gallery and office space, would occur atop the proposed lower level expansion about 12 feet above grade at the 45 Hyde Street site.

On p. 70, the second sentence under "Conclusion," is revised for clarity in the description of interior changes, as follows (new language is underlined; deleted language is indicated with ~~strikethrough~~):

The project would include demolition of ground floor elevator lobbies; demolition of the panels in the outer walls of the second-floor loggia that contain the Piazzoni murals, and removal of the Piazzoni murals, retaining ~~only other wall elements~~ including the columns, wall base and entablature (including inscriptions), and constructing new columns; ~~removal of the Piazzoni murals;~~ construction of a new floor level within the second-story reading rooms; partial demolition of the north wall of the Fulton Street reading room and construction of large openings at the second and new third floors; and demolition of north and south portions of the east wall of the Larkin Street reading room; as well as demolition of numerous other spaces identified in building survey reports as having historic architectural merit.

On p. 72, the following references is added to accommodate completion of the Historic Structure Report:

Page & Turnbull, *Historic Structure Report, Old Main Library, San Francisco, California*, August 19, 1998.

The following references are deleted from p. 72:

Page & Turnbull, *Preliminary Assessment: Impact of Asian Art Museum Design on Historic Resources, Old Main Library*, March 5, 1998.

Page & Turnbull, *Historic Structure Report, Old Main Library, San Francisco, California*, Preliminary Draft, July 1997.

On p. 95, the first sentence of the fifth paragraph is revised as follows to clarify the demolition that would occur in the second floor loggia (new language is underlined; deleted language is indicated with ~~strikethrough~~):

As discussed in Chapter III and set forth in Table 3, p. 63, the project would remove the Piazzoni murals and demolish the wall panels in the second floor loggia on which the murals are mounted, ~~partially~~ demolish the east wall of the second-floor loggia, demolish the ground-floor elevator lobbies, and construct a new floor level within the second-story reading rooms.

Because the Secretary of the Interior's *Standards for Rehabilitation* allow for some interpretation, the second sentence under "Alternative B" on p. 98 is deleted.

On p. 108, the first sentence of the second full paragraph is revised as follows to clarify the description of Alternative C (new language is underlined; deleted language is indicated with ~~strikethrough~~):

Similar to the project, this alternative would include demolition of most of the ground floor interior to accommodate temporary galleries, the museum store, ~~and a cafe,; offices, would be on the third floor~~ and classrooms in the 45 Hyde Street addition, ~~and the space devoted to those uses in the project would instead be used as permanent gallery space.~~

On p. 108, the last paragraph, continuing to p. 109, is revised as follows to clarify the description of Alternative C (new language is underlined; deleted language is indicated with ~~strikethrough~~):

The 45 Hyde Street addition, with the same building envelope as Phase 2 of the proposed project, would include a new lower level, as proposed with the project, and three stories, at the same floor levels as those of the old Main Library building, to accommodate an auditorium on the first two floors and gallery space ~~and classrooms~~ on the ~~second and~~ third floors. Because it would accommodate some of the currently proposed gallery space at 45 Hyde Street, this alternative would preclude some of the future expansion space anticipated as Phase 2 of the proposed project. Figures 16 through 19, pp. 109a-109d, depict floor plans for Alternative C.

SECTION F

MATERIALS ADDED TO THE SEIR

This section of the Draft Summary of Comments and Responses presented figures, referenced previously in the text of the Summary of Comments and Responses, that are added to the SEIR. In this Final SEIR, the figures below have been incorporated within the SEIR: "Revised Figures from Draft SEIR" and "New Figures added to SEIR Main Text" are found in the SEIR text, with page numbers as noted in the Table of Contents. "New Figures added to SEIR Appendix" are found in Appendix A of this Final SEIR.

REVISED FIGURES FROM DRAFT SEIR

3. (Revised) Proposed Fulton Street Elevation
4. (Revised) Proposed Hyde Street Elevation
5. (Revised) Proposed McAllister Street Elevation
10. (Revised) Civic Center Historic Districts

Floor Plans (Appendix A): Now Includes Existing / Demolition Plans *and* Proposed Floor Plans

These are reduced-size versions of the floor plans included in the Certificate of Appropriateness Application, and are prepared by the project architect. For each existing floor (ground level – Fig. 4, second floor – Fig. 6, and existing third floor – Fig. 9), there is an "Existing/Demolition Plan" that identifies existing room numbers in the old Main Library building, Exceptionally Significant Interior Spaces listed in Article 10 of the Planning Code, and the "Preservation Zone" rating from the Page & Turnbull Historic Structure Report. For each proposed floor level (ground level – Fig. 5, second floor – Fig. 7, proposed new third floor – Fig. 8, and fourth (existing third) floor – Fig. 10) there is a figure that identifies proposed uses in the Asian Art Museum.)

NEW FIGURES ADDED TO SEIR MAIN TEXT

(Page numbers are those on which figures appear in this Final SEIR)

- | | |
|---|-----|
| 8A. West Gallery Interior Elevations – South and West Walls (Room 201) | 39a |
| 8B. West Gallery Interior Elevations – North and East Walls (Room 201) | 39b |
| 8C. South Gallery Interior Elevations – South and West Walls (Room 210) | 39c |
| 8D. South Gallery Interior Elevations – North and East Walls (Room 210) | 39d |

9A. Architect's Rendering of Proposed Central Court, Looking Southeast from Stair Loggia	41a
10A. Piazzoni Murals - The Sea (North Wall)	56a
10B. Piazzoni Murals - The Land (South Wall)	56b
10C. Architect's Rendering of Larkin Street Facade	60a
10D. Visual Simulation of Asian Art Museum and New Main Library	60b
10E. Visual Simulation of Second Floor Fulton Street Reading Room (Room 210), Looking East	65a
10F. Visual Simulation of Second Floor Larkin Street Reading Room (Room 201), Looking North	65b
11A. Visual Simulation of Second Floor Stair Loggia (Room 290)	67a
11B. Visual Simulation of Monumental Staircase (S101) and Second Floor Loggia (290), Looking West	67b
11C. Visual Simulation of Larkin Street Entry (Room 101), Looking North	69a
16. Reduced Impact Alternative C: First Floor	109a
17. Reduced Impact Alternative C: Second Floor	109b
18. Reduced Impact Alternative C: Third Floor	109c
19. Reduced Impact Alternative C: Fourth Floor	109d

NEW FIGURES ADDED TO SEIR APPENDIX

A-2 Exterior Views of Old Main Library

A-3 Exterior Views of Old Main Library

Figures A-4 through A-12 show Exceptionally Significant Interior Spaces

A-4 Main Floor Rooms

A-5 Monumental Staircase (S101)

A-6 Second Floor Rooms

- A-7 Second Floor Rooms
- A-8 Second Floor Stair Loggia Room 290
- A-9 Second Floor Stair Loggia Room 290
- A-10 Piazzoni Murals A
- A-11 Piazzoni Murals B
- A-12 Murals by Frank Vincent duMond

CHAPTER IX

APPENDICES

APPENDIX A: HISTORIC ARCHITECTURAL RESOURCES

This appendix contains the Page & Turnbull Preliminary Assessment of project impacts on historic architectural resources. This report was used in the evaluation of impacts on historic architectural resources in Chapter III of the EIR.

Also included in this appendix are figures identifying existing room numbers in the old Main Library Building. These are reduced-size versions of the floor plans included in the Certificate of Appropriateness Application, and are prepared by the project architect. For each existing floor (ground level – Fig. 4, second floor – Fig. 6, and existing third floor – Fig. 9), there is an “Existing/Demolition Plan” that identifies existing room numbers in the old Main Library building, Exceptionally Significant Interior Spaces listed in Article 10 of the Planning Code, and the “Preservation Zone” rating from the Page & Turnbull Historic Structure Report. For each proposed floor level (ground level – Fig. 5, second floor – Fig. 7, proposed new third floor – Fig. 8, and fourth (existing third) floor – Fig. 10) there is a figure that identifies proposed uses in the Asian Art Museum.

Finally, this Appendix includes additional graphics added to the SEIR as part of the Summary of Comments and Responses.

PRELIMINARY ASSESSMENT: IMPACT OF ASIAN ART MUSEUM DESIGN ON HISTORIC RESOURCES, OLD MAIN LIBRARY

Following is the current evaluation of the effect of the new design for the Asian Art Museum on the historic resource of the Old Main Library. This assessment is based on the current drawings from the design development phase. This assessment evaluates each major aspect of the proposed design, describing the parts of the building it would affect, and what changes it would make. To evaluate each aspect of the design, the Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* are applied. These federal rules, prepared under the National Historic Preservation Act, are the most commonly applied measures for judging rehabilitation projects. The *Standards* are a short, 10-point list of general concepts, while the *Guidelines* are a much longer document which gives more detailed examples of how to apply the *Standards* to specific building elements. This assessment cites relevant language from the *Standards* or *Guidelines* and describes the approach taken for each element in the design for the new museum. The evaluation provides as background the rating for each elevation, space or element given the Historic Structure Report (HSR) for the Asian Art Museum by Page & Turnbull.

The assessment also evaluates each design aspect under Article 10 of the *Planning Code of the City and County of San Francisco*. Article 10 provides certain historic preservation procedures for review of building permit applications. It requires owners of designated landmark buildings and buildings in historic districts to obtain a Certificate of Appropriateness in order to get a building permit. The Planning Commission, the Planning Department and the Landmarks Preservation Advisory Board review applications to determine whether a Certificate of Appropriateness is to be issued. Section 1006.7 of the Planning Code requires the review to "be guided by" a series of standards. The relevant standards, mostly from Section 1006.7 (c), are cited below. Article 10, Appendix J designates the Old Main Library as part of the Civic Center Historic District, and designates certain interior spaces and features (which are listed below) for preservation procedures. Article 10, Appendix J, Sec. 9 (b) (2), provides additional criteria for review of applications for Certificates of Appropriateness for the Civic Center district, which are also cited below where applicable. Article 10, Appendix J, Section 8 (a) states that "all governmental bodies" are to cooperate to ensure that the alterations of buildings in the district comply with the Secretary's *Standards*, but the *Standards* are not mentioned in the last column because the information is available in the neighboring column.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
West, South, North Elevations	Hip-roof screens for new mechanical rooms and equipment on roof	The Museum requires strict temperature and humidity control for the art. A new mechanical system must be installed in the building. Locating the equipment on the roof has the least impact to the interior historically significant spaces	Roof has a small vertical screen, set back from west elevation	New metal hip roof 16 feet high on west, with lower screens on south, north, and east elevations	Exterior of building included in Article 10 listing	Article 10 Listing	<i>Standard 3</i> says "Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken." "The hip roof alters the original design of the most significant exterior elevations by adding the form of the historic roofs of other Civic Center buildings." <i>Standard 9</i> says, "The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." The new hip roof is articulated in a manner which varies from one part of the elevation to another, which is not compatible with the highly regular existing original elevations of the building The <i>Guidelines</i> recommend placing new mechanical systems so that they cause "the least alteration possible to the building's floor plan, the exterior elevations..." Major mechanical system elements are being placed on the roof, where they cause a significant alteration to the exterior elevations.	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." Section 1006.7(c) of the <i>Planning Code</i> says "...any new construction, addition or exterior change shall be compatible with the character of the historic district..." The Landmarks Board and the Planning Commission will have to determine how changing the historic elevations by adding a hip roof is judged under these provisions. While the hip roof alters the overall appearance of the building and changes the visual role of the historic design, it does not affect the existing exterior walls physically.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
East Elevation	Other HVAC equipment	Same as above.	Few, small items	New fan rooms and ducts	Entire exterior listed	Preservation 2	The <i>Guidelines for Rehabilitating Historic Buildings</i> recommend installing HVAC on the roof so that it is "inconspicuous from the public right of way" and "does not damage or obscure character-defining features." This portion of the mechanical system fits that description.	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district."
South Elevation	Exit doors	New life safety-code-required exit stairs are being installed in the building that need to exit directly to the exterior of the building.	Openings are windows	Window removed, opening enlarged, door inserted -- two openings, each with double-leaf door	Entire exterior listed	Significant	The <i>Guidelines for Rehabilitating Historic Buildings</i> recommend "complying with health and safety codes...in such a manner that character-defining spaces, features, and finishes are preserved." Enlarging two windows on the south elevation to make them into doors is consistent with preservation of the south elevation. Although two individual windows will be lost as elements of the building, the windows as a collective element in the exterior will be preserved.	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." Changing windows to doors will not damage or destroy features of the building, overall. Article 10, Appendix J, Section 9 (b) of the <i>Planning Code</i> says alterations shall "be compatible with respect to height, massing, fenestration, materials, color, texture, detail, style, scale and proportion, signage, landscaping and street furniture which may define the character of the historic district..." New openings will be compatible with the building and district in materials, scale and proportion and details. Because the existing south entry is being fixed shut, the Landmarks Board and the Planning Commission will have to decide whether Article 10 permits alteration of windows to provide exiting.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
South and East Elevations	Doors to cafe	To provide a further amenity to the cafe and the Fulton Street Mall, outdoor cafe seating will be provided on the south side of the building. These doors provide access.	Openings are windows	Window removed, opening enlarged, door added -- two openings, each with double-leaf door	Entire exterior listed	Significant	The <i>Guidelines for Rehabilitating Historic Buildings</i> recommend "Designing and installing additional entrances...on secondary elevations... limiting such alteration to non-character-defining elevations." The south elevation is a character-defining elevation, and cannot be described as a secondary elevation.	See evaluation of the preceding item.
Site South of Building on Fulton Street	Outdoor eating area	Same as above.	Site has stairway, grassy area with trees	New paved terrace under trees; new wheelchair ramp	Entire exterior listed	Article 10 Listing	The <i>Guidelines for Rehabilitating Historic Buildings</i> recommend designing new site features "so that they are as unobtrusive as possible and assure the preservation of the historic relationship between the building...and the landscape." The new terrace will be noticeable, but it will not upset the fundamental relationship between the building and the landscape. This evaluation cannot be final until the design is definitive.	Article 10, Appendix J, Section 9 (b) of the <i>Planning Code</i> says alterations shall be "compatible with respect to height, massing, fenestration, materials, color, texture, detail, style, scale and proportion, signage, landscaping and street furniture which may define the character of the historic district.. The new terrace will be compatible with the district, although this evaluation cannot be final until the design is definitive.
All Elevations	Monumental windows on second floor; and third floor windows on light courts; and all other windows	The existing glazing has inadequate control of light and air infiltration for protection of art. Third floor light court windows are deteriorated. Glazing at all windows must present a uniform appearance.	Original windows	All existing windows replaced. New walls and floors behind some windows. Monumental windows will have new windows with white glass installed on interior to control light at galleries. Third floor light court windows will be replaced with aluminum-clad wood units.	Entire exterior listed	Article 10 Listing for exterior; light courts not specifically rated	The <i>Guidelines</i> recommend "identifying, retaining and preserving windows" and recommend against "removing or radically changing windows which are important in defining the historic character of the building..." The <i>Guidelines</i> also recommend against "Retrofitting or replacing windows rather than maintaining the sash, frame and glazing," or the use of designs "which noticeably change the sash" as well as "changing...the reflectivity and color of the glazing." The new glazing differs only slightly in color or reflectivity from the existing. The approach to the monumental windows avoids obtrusive changes to the exterior glazing. The third floor windows on the light courts will be replaced, not maintained, and the new sash will differ noticeably from the original.	Under Article 10, "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, the exterior architectural features." The visual appearance of the new third floor windows will change. The Landmarks Board will have to decide whether these changes "preserve, enhance or restore" or "damage or destroy" the exterior of the building.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
West and South elevations	Lighting of building	Lighting as part of the city program which will include the principal elevations of Civic Center buildings may be incorporated in the project.	Exterior does not have lighting	Add exterior lighting to south and west elevations	Entire exterior listed	Article 10 listing	Alteration of significant elements of the building would be the main issue under the <i>Standards</i> . Because the lighting has not been designed, it cannot be evaluated. The illumination itself is not a physical or permanent effect on the building.	Similar to Secretary's <i>Standards</i> .
West Elevation	Removal of statues in second floor colonnade	It is important that the front facade of the building give an indication of what is in the building. The statues are in very poor condition.	Five statues commissioned between 1915 and 1917	Statues to be removed	Part of exterior, not specifically cited in designation	Very Significant	<i>Standard 2</i> states, "The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." A feature which characterizes the property will be removed <i>Standard 5</i> states, "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." A distinctive character-defining feature will not be preserved. <i>Standard 6</i> states, "Deteriorated historic features shall be repaired rather than replaced..." This is predicated on the assumption that a feature would not be removed simply because it is deteriorated. The deteriorated feature will be removed, not repaired (or replaced).	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." Removal will eliminate the statues as exterior architectural features of the building. The statues are compatible with the district. The Landmarks Board and the Planning Commission will have to decide whether a reasonable effort has been made to preserve and not to damage them.
Site West of Building on Larkin Street	Wheelchair ramp and site improvements	The ramps must be coordinated with most for the base isolation to meet the federal and state requirement for disabled visitors to enter building through the main entrance.	Site has existing ramp	New signs & kiosks; new wheelchair ramp	Entire exterior listed	Article 10 Listing	The <i>Guidelines</i> recommend designing new site features "so that they are as unobtrusive as possible and assure the preservation of the historic relationship between the building...and the landscape." The new ramps and other items will be unobtrusive, and will not alter the relationship of the building to the landscape. This evaluation should be verified when the design is complete.	Appendix J, Section 9 (b) says "any alteration...shall (1) be compatible with respect to... signage, landscaping and street furniture which may define the character of the historic district..." The ramps and other site elements appear to be compatible with the district. This should be verified when the design is complete.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
North Elevation	Windows, glazing; same condition at some first floor toilet rooms	Due to building upgrades mechanical, electrical, plumbing and elevator shafts would be viewed from exterior	Stack windows with clear vision glass	Gray-green spandrel glass in existing frames and sash at north elevation; non-vision glass in toilet rooms.	Entire exterior listed	Very Significant	The <i>Guidelines</i> recommend retaining the glazing of significant windows where it is a decorative feature and recommend against "changing the historic appearance of windows through inappropriate...reflectivity and color of the glazing." The new spandrel glass on the north elevation is markedly different in color from the original, significantly changing the appearance of the windows. The <i>Guidelines</i> also recommend placing new mechanical systems so that they cause "the least alteration possible to the building's floor plan, the exterior elevations..." The former stacks are a secondary floor plan element. Unobtrusive obscure or non-vision glazing at new obstructions behind original windows would comply with the <i>Standards</i>.	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." Section 1006.7(c) of the <i>Planning Code</i> says "...any new construction, addition or exterior change shall be compatible with the character of the historic district..." The Landmarks Board will have to decide whether the new gray-green spandrel glass preserves and enhances the exterior, or damages it, and whether this material is compatible with the character of the district.
North Elevation	Exit doors	New life safety code required exit stairs are being installed in the building that need to exit to the exterior of the building	Openings are windows	Window removed, opening enlarged, door inserted	Entire exterior listed	Significant	The <i>Guidelines</i> recommend "Designing and installing additional entrances or porches on secondary elevations when required for the new use in a manner that preserves the historic character of the buildings." The north elevation can be categorized as secondary; the new doors will preserve the character of the building.	Article 10 says the "work shall preserve, enhance or restore, and shall not damage or destroy, the exterior architectural features of the landmark." The new doors are consistent with preserving the building's exterior, overall.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
North and South Courtyard Elevations/ Sections and East Elevation	Plaster finish	The areas with this treatment will be internal to the site and once full build-out of the site occurs, they will not be visible from the street.	Glazed brick on secondary elevations	Brick to be replaced with synthetic stucco	Entire exterior listed	Significant	The <i>Guidelines</i> recommend "Identifying, retaining and preserving masonry features that are important in defining the overall historic character of the building" and recommend against "Applying paint or other coating such as stucco to masonry that has been historically unpainted or uncoated to create a new appearance." The historic brick is not of utmost importance in the overall character of the building, but the stucco will create a new appearance. <i>Standard 9</i> says "New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." The new material will eliminate a historic material that characterizes the property; the new will be differentiated from the old material, but will not be compatible in size and scale, being a single, monolithic field instead of a linear composition of small units.	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." Section 1006.7(c) of the <i>Planning Code</i> says "...any new construction, addition or exterior change shall be compatible with the character of the historic district..." The brick, which is compatible with the district, will be eliminated as an exterior feature. The Landmarks Board and the Planning Commission will have to determine whether a reasonable effort has been made to preserve it. Likewise, they will have to decide whether the new stucco is compatible with the district. The addition which will eventually conceal the stucco would comply with Article 10 when completed, because the addition would have to be approved under the Planning Code. If an addition were added now, the brick could be entirely covered by it immediately.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
North, East Elevations	Glass-enclosed atrium and stairs	The Museum needs a central focal point and gathering point on the first floor. From this central space there needs to be access to the Museum.	Two separate interior light courts open to sky	Skylights; glass-enclosed stair on north side of south wing	Entire exterior listed	Article 10 Lasting	<i>Standard 9</i> says, "New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." The new construction will not destroy existing elements which characterize the building; the new materials and design seek compatibility through a simple, clean contrast with the original.	Section 1006.7 (b) says "The proposed work shall not adversely affect the special character or special historical, architectural and aesthetic interest or value of the landmark and its site, as viewed both in themselves and in their setting, nor of the historic district in applicable cases." Although the exterior of the building will change, the new elements of the alterations will be oriented the same way in relation to the Civic Center as the modernist south and east elevations of the New Main Library.
East Elevation and Site on Hyde Street	Basement addition, truck access and site work	The Museum requires more square footage than the existing building offers. It also needs a loading dock for deliveries and an area for trash handling.	45 Hyde Street has been demolished for project	Construct addition on site of 45 Hyde Street, with parapet about 12 feet above sidewalk. Addition will have a blank east wall faced with synthetic stucco. Also on this part of the site will be a new driveway and loading dock	Entire exterior listed	Article 10 Lasting	The <i>Standards</i> say "New additions...will not destroy historic materials, features and spatial relationships...(and) shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion and massing..." The addition will not affect historic materials, features and spatial relationships. It is clearly differentiated from the existing. The stucco is unrelated in character to the existing materials, and no portion of the existing building presents a blank face to the street. The <i>Guidelines</i> recommend "Designing new...loading docks...so that they are as unobtrusive as possible and assure the preservation of the historic relationship between the building...and the landscape." The new loading docks will be unobtrusive and will not disturb the relationship between the building and the site.	Section 1006.7 (b) says "The proposed work shall not adversely affect the special character or special historical, architectural and aesthetic interest or value of the landmark and its site, as viewed both in themselves and in their setting, nor of the historic district in applicable cases." The Landmarks Board and the Planning Commission must determine whether the very small addition adversely affects the special character of the historic building simply because it differs from it in materials and architectural character. <i>Planning Code</i> Appendix J, Section 9 (b) says "any alteration...shall be compatible with respect to...signage, landscaping and street furniture which may define the character of the historic district." The truck access and loading dock will be on the opposite side of the building from the Civic Center plaza; this matches the predominant location of this feature on other Civic Center buildings.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
Exterior, general	Cleaning and repair of masonry	The exterior of the building should be clean and inviting.	Masonry soiled, limited damage and deterioration observed	Stone and brick will be cleaned and re-pointed; damaged areas will be repaired	Entire exterior listed	Article 10 Listing	<i>Standard 5</i> says "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." The cleaning and repair will preserve the masonry; a distinctive character-defining element of the exterior. <i>Standard 7</i> says, "Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible." The gentlest effective treatment will be used for cleaning. Characteristics and tooling of new mortar will match old mortar. Final design documents should be verified.	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." The cleaning and repair will enhance and restore exterior architectural features of the building which are compatible with the district. Article 10, Appendix J, Section 9 (d) says "...any acid wash, sandblasting, high pressure wash or other abrasive methods is discouraged..." The intent is to use the gentlest method which removes soiling and stains. Only cleaning products which have been permitted in widespread use on preservation projects will be considered. The final specifications should be reviewed.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
All Elevations	Base isolation moat covers	The perimeter moat is required for the base isolation system.	Conventional fixed foundation	Moat below grade, with covers integrated into existing wall base	Entire exterior listed	Article 10 Listing	The <i>Guidelines</i> recommend repairing the structural system in preparation for the new use without damaging interior spaces or the exterior. The design will not significantly disturb the existing wall details or interior spaces. The moat design should be reviewed when the construction documents are complete.	Section 1006.7(c) of the <i>Planning Code</i> says "reasonable efforts shall be made to preserve, enhance or restore, and not to damage or destroy, the exterior architectural features of the subject property which are compatible with the character of the historic district." Section 1006.7(c) of the <i>Planning Code</i> says "...any new construction, addition or exterior change shall be compatible with the character of the historic district..." The seismic design, including the moat, will not destroy architectural features of the exterior, although it will involve some changes, which will be compatible with the district. The moat design should be reviewed when the construction documents are complete.
Location: Interior	Interior features	The museum program will require that the finished interior present a unified and cohesive architectural appearance.	Interior spaces range from virtually original to highly altered, with many original features throughout the building	At this point, the degree of change to interior architectural features such as flooring, baseboards, moldings, doors, paneling, cornices and hardware has not been identified	Some interior spaces are listed, but the vast majority are not	Spaces vary from Non-Contributing to Article 10 Listing; features vary from Non-Contributing to Very Significant	<i>Standard 1</i> seeks a use for the building "that requires minimal change in its distinctive materials, features..." and <i>Standard 2</i> says "The removal of distinctive materials or alteration of features... that characterize a property will be avoided." The <i>Guidelines</i> include columns, cornices, baseboards, paneling, light fixtures hardware and flooring among features which may be important in defining the overall historic character of the building. These measures are generally judged in the context of the entire building when the design is complete. At this time, the drawings are too preliminary to make a final assessment, but it appears that most historic features will be eliminated outside Article 10 spaces. This should be reviewed when the design is complete.	Article 10, Appendix I, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i>, which says "the proposed work shall preserve, enhance or restore, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." The design for the spaces listed in Article 10 is more developed than the design for other spaces, although it is not complete. Many important features in Article 10 spaces which are not discussed elsewhere in this evaluation appear at this time to be retained. This should be verified when the construction documents are complete.
Basement	General alteration of spaces	The back of house program elements for the Museum are required to be located on the Lower Level.	Many basement spaces are original	Existing walls and building systems demolished, new layout and systems.	No spaces listed	Non-Contributing, except ST2 rated Preservation 2 and light courts rated Preservation 3	The <i>Guidelines</i> recommend "accommodating service functions such as bathrooms, mechanical equipment and office machines required by the building's new use in secondary spaces." The basement is occupied almost exclusively by secondary spaces.	Does not affect listed interior spaces.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
First Floor	Central Court on first floor east of S101-- includes space and new skylight above (see also circulation elements of new design and changes to spaces around new Central Court)	The Museum needs to have a central gathering place that gives the interior of the Museum a focus. The space is needed for selling tickets, gathering of groups and, queuing for special exhibitions out of the weather.	Original Beaux-Arts part with main sequence in S101 and light courts	New primary public space behind S101, and interior atrium where light courts now are	Rooms 192 and 193 listed	192 and 193 Article 10 Listing; 115 Non-Contributing other spaces Preservation 3.	Standard 2 says, "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Rooms 192 and 193, which will be removed, are character-defining spaces. The rest of the Central Court occupies what were historically secondary spaces.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i> , which says, "the proposed work shall preserve, enhance or restore, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." As currently drawn, the new design will remove Rooms 192 and 193 instead of preserving, enhancing or restoring them. The rest of the scheme affects spaces which are not listed in Article 10.
	Rooms 191, 101, and 190	Rooms 101, 190 and 191 will be used as the entrance foyer for the building.	Original condition, except for checkout desk in 101	Spaces will be restored	191, 101 and 190 listed	191, 101 and 190 Article 10 Listing	Standard 2 says, "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." These character-defining spaces will be preserved.	Section 1006.7(b) of the <i>Planning Code</i> says "the proposed work shall preserve, enhance or restore, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." The design will enhance and restore listed spaces.
	Room 198	Room 198 will be used as part of the cafe seating area	Original condition, except two door leaves removed and new lighting added.	Floor leveled, existing glazed vestibule partition removed, new glazed partition and door added at corridor, existing exterior door fixed shut	Not listed	Preservation 1	The <i>Guidelines</i> recommend "removable partitions that do not destroy the sense of space... be installed when the new use requires the subdivision of character-defining interior space." The sense of space will not be destroyed and the new glazed partition will be at least partially removable. This should be reviewed when the construction documents are complete.	Will not affect listed spaces.
	Rooms 102, 104, 105, 114, 116, 118 and 194 and adjacent smaller subsidiary spaces	These areas will be incorporated into program space including the Members' Lounge, Cafe, main toilet rooms and other visitor services.	Varying degrees of alterations, but basic original spaces mostly intact	Major changes to the basic layout of spaces	None listed	Preservation 2	The <i>Guidelines</i> recommend, "retaining, and preserving a floor plan or interior spaces that are important in defining the overall historic character of the building." Although some of these spaces contribute to the character of the building, none is individually important overall, and the new organization of spaces is generally compatible with the original.	Will not affect listed spaces.

Location: Exterior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
	Room 103	This space will be incorporated into program space for Museum visitor and member services.	Original large service space	Finishes and use altered; floor level changed; space intact	Not listed	Non-Contributing	The <i>Guidelines</i> recommend "retaining, and preserving a floor plan or interior spaces that are important in defining the overall historic character of the building." Changes in interior finishes do not necessarily affect important features of building. The final finishes should be reviewed when the design is complete.	Will not affect listed spaces.
	Conversion of stacks to new program spaces	The seismic design, floor loading, ceiling heights, finishes and function are not appropriate for the Museum. The new floors will align with the basement through third floor levels of the building to provide continuity and make the space usable for the Museum program.	Seven-tier stack to north wing; two-tier stack in south wing. The main stacks (S11) align with the second floor and a landing in corridor 197 on the first floor, but they do not align with the basement.	The original book stacks, which integrate floor structure and the shelving system, will be demolished; new floors will be constructed in north wing	Not listed	Preservation 3	The <i>Guidelines</i> call for preserving interior features "that are important to defining the overall historic character of the building." <i>Standard 5</i> says, "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." The book stack system is a distinctive feature which contributes to the overall character of the building. It is an example of a construction technique which characterizes the property. It will be removed. The <i>Guidelines</i> recommend "installing permanent partitions in secondary spaces..." The original design of the building did not include public access to the stacks, so they could be deemed a secondary space.	Will not affect listed spaces.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
Second Floor	New floor inserted in monumental spaces 201, 202, 203, 210 and 218. Requires removal of DuMonod murals in 201 and 210.	The existing building as configured does not meet the square footage requirements of the Museum. To meet this need, new floors are proposed for these spaces. The scale of the objects displayed by the Museum are generally quite small, so there is also a need to reduce the height of the space to be compatible with the objects on display.	Monumental spaces up to roughly 40 feet high	New floor inserted, cutting the existing spaces in two, except for narrow slots at monumental windows. Murals in Rooms 201 and 210 painted by Frank Vincent DuMonod would be removed. Reversibility: floor could be removed at a later date and restoration of affected spaces undertaken.	All spaces listed; DuMonod murals not listed	Article 10 Listing (space); Very Significant (murals)	<i>Standard 2</i> says, "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." The proportions of the spaces on the second floor characterize the property. The second floor spaces will be fundamentally altered. <i>Standard 9</i> says, "New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." The new floor will require removal of existing materials which characterize the property, such as the door casings and pediments in Room 210 and the DuMonod murals. The alteration of the spaces will not protect the historic integrity of the property. The <i>Guidelines</i> recommend against "Inserting a new floor within a building that...radically changes a character-defining interior space; or obscures, damages or destroys decorative detailing." The new floor will radically alter character-defining interior spaces and will obscure, damage or destroy decorative detailing. The new floor will be visible from the exterior, at least under certain lighting conditions. Because the design is not complete, this effect cannot be evaluated fully at this time. It should be revisited when the design is complete.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i>, which says "the proposed work shall preserve, enhance or restore, and shall not damage or destroy...where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." This part of the design subdivides spaces listed in Appendix J into two or more distinct spaces apiece. This will not preserve or restore the spaces, and will alter them radically. The DuMonod murals are not listed in the Article 10 designation. The new floor will be visible from the exterior, which is listed in Article 10. Because the design is preliminary, the importance of this effect cannot be evaluated. It should be reviewed when the design is complete.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
	Removal of murals and cutting of windows in their place in Room 290	The area of the Loggia is required for the display of the Museum's program. The Museum also wants a visual connection with the rest of the building to provide the visitor with orientation during their visit.	14 murals by Goffredo Piazzi in bays on three walls of space	Murals removed; wall in seven bays on each side removed to create windows (or glazed display cases) into atrium. Reversibility: murals could be rehanging in their present location at discretion of project sponsor. In order to create the new openings, the existing steel columns in the long walls of this space must be removed and new columns installed. The design calls for protection and restoration of existing original finishes adjacent to the new openings.	Murals listed	Very Significant	<i>Standard 5</i> says, "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." The murals are distinctive features and examples of craftsmanship which contribute to the significance of the building. They will be removed from the building. The <i>Guidelines</i> recommend against "installing new windows...that...damage or destroy character-defining features." The windows will significantly alter the space in Room 290 and the original day lighting scheme. Finishes which are to remain, including faux-traverse plaster and travertine, also fall under the language of <i>Standard 5</i> . The final design documents will determine whether the interior finishes are preserved during the structural work required for creating the new openings.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i> , which says, "the proposed work shall preserve, enhance or restore, and shall not damage or destroy ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." This aspect of the design will remove historic features of the building which are specifically cited in the Civic Center district landmark designation. The final design documents will determine whether the structural work required to create the new openings preserves adjacent original interior finishes which are to remain and avoids damaging them, as described in Section 1006.7 (b).

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
	Other alterations to major public spaces for conversion to gallery use -- Rooms 201, 202, 203, 210 and 218.	These spaces will be converted to gallery spaces to achieve the Museum's program.	Reading and reference rooms, substantially unchanged from original condition	New windows on interior side of original monumental windows, new HV/AC, electrical, lighting and other building systems; new duct and stair cores; bookshelves and other library items removed	All spaces listed	Article 10 Listing	The recommendation in the <i>Guidelines</i> is "Installing a completely new mechanical system if required for the new use so that it causes the least alteration possible to the building's floor plan, the exterior elevations, and the least damage to the historic building material." The new mechanical systems will be installed so that new duct chases occur at existing cavities or new partitions such as exit stairs. The design avoids alterations to spaces or partitions that are intact. <i>Standard 5</i> says, "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." The <i>Guidelines</i> recommend, "Reusing decorative material or features that have had to be removed during the rehabilitation work including wall and baseboard trim, door molding, paneled doors and simple wainscoting, and relocating such material or features in areas appropriate to their historic placement." The bookshelves and other library items are distinctive, and they characterize the property. While they cannot be retained in the galleries for programmatic reasons, it has not been determined whether any can be retained elsewhere as recommended by the <i>Guidelines</i>. This question should be reviewed when the construction documents are complete.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i>, which says, "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." The mechanical design will not damage or destroy listed interior spaces or features. The Planning Commission and the Landmarks Board will have to determine whether Article 10 requires any particular treatment of the library items.
	Alteration of Room 201	The museum program requires additional space in this room.	Room 201 retains its original plan	The east walls will be relocated to include the current Corridor 201 B and C in Room 201	Room 201 is listed	Article 10 Listing (201); Preservation 2 (201 B and C)	The <i>Guidelines</i> recommend "preserving a floor plan or interior spaces that are important in defining the overall historic character of the building," including the size and configuration of rooms. "Altering the floor plan by demolishing principal walls and partitions to create a new appearance" is not recommended. Room 201 will be altered, not preserved, and a large portion of a principal wall will be removed, creating a new appearance.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i>, which says, "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." Article 10 lists room 201; the Landmarks Board and the Planning Commission will have to decide whether the proposed change constitutes damage to the historic space or only a change in one of its four walls.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
	New elevator partially within Room 200	The new circulation scheme requires an elevator next to the new main stair, the architectural integrity of the new interior courtyards requires pushing the elevator shaft into Room 200	Room 200 has not been altered at the walls	The new elevator will intrude about one foot through the south wall of the room, interrupting the faux-travertine construction	Room is listed	Article 10 Listing	The <i>Guidelines</i> recommend "placing new code-required stairways or elevators in secondary and service areas" and recommend against "radically changing, damaging, or destroying character-defining spaces, features or finishes" for new elevators. Room 200 is primary, not a secondary or service area, and the design will change character-defining spaces and features.	Section 1006.7(b) of the <i>Planning Code</i> says "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." Article 10 lists room 201; the Landmarks Board and the Planning Commission will have to decide whether the proposed change would constitute damage to the historic space or a minor intrusion in one wall.
	New openings from Room 210 to atrium	The north wall is unreinforced masonry and will be removed to complete the seismic retrofit. The new openings will open up the Second and new Third Levels into the atrium to aid orientation and provide the visitor with a view into the Central Court and to the other exhibit galleries.	Monumental arched windows to light court	Original arched windows removed and new unglazed rectangular openings cut in the north wall of Room 210 to connect it with the skylit atrium	Room is listed	Article 10 Listing (space) Very Significant (windows)	<i>Standard 5</i> says, "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." The historic arched windows on the north side of Room 210 are a distinctive feature which characterizes the property, and will be removed. The <i>Guidelines</i> recommend against "installing new windows... that... damage or destroy character-defining features." The new windows will require removal of the existing ones, which are character-defining.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i> , which says, "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." The space is listed in Appendix J to be a major interior architectural feature, but the windows on its north wall are not in this class.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
	Room 212 and other second floor spaces	The cube volume of the Great Hall will be connected to the north and south wings of the building by pedestrian bridges at the Second Level. This will reinforce the prominence of the Great Hall and provide views to the east from the Central Court.	Few spaces extensively changed from their original condition	Most spaces demolished	Not listed	212 Preservation 1; others Preservation 3	<i>Standard 2</i> says, "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Room 212 is distinctive and characterizes the building. It will not be retained or preserved. The other spaces are so not distinctive that they characterize the property overall.	Will not affect listed spaces.
New Third Floor	This floor does not exist now. All effects on the existing building are listed under the second floor.	This floor is being added at the stack area to replace the flooring in the stacks. The rest of the floor is being added to accommodate the Museum's program.						

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
Existing Third Floor	New library in 301 and Documents Center in 390	The Museum's new library will be located in this area.	Periodicals Room and Elevator Lobby substantially unchanged from original	Spaces subdivided; skylight in 301 removed	Not listed	Preservation 1	<i>Standard 1</i> says, "A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building..." The intent is to match the new use reasonably to the building so that important features can be retained with the new use. One wall which defines the room will be removed, the skylight will be removed and the book cases will be removed. The room will be divided into several spaces. Although the new use matches the original use, the intent of <i>Standard 1</i> of retaining important features will not occur. <i>Standard 2</i> says, "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Room 301 is distinctive and characterizes the building. It will be altered, including permanent changes to its partition layout. <i>Standard 5</i> says, "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." The skylight, bookshelves and moldings, which characterize the property, will not be preserved. The <i>Guidelines</i> recommend installing "removable partitions that do not destroy the sense of space" if primary spaces are to be reconfigured. Room 301 is a primary space. The new partitions will not be removable, and they will alter the sense of space.	Will not affect listed spaces.

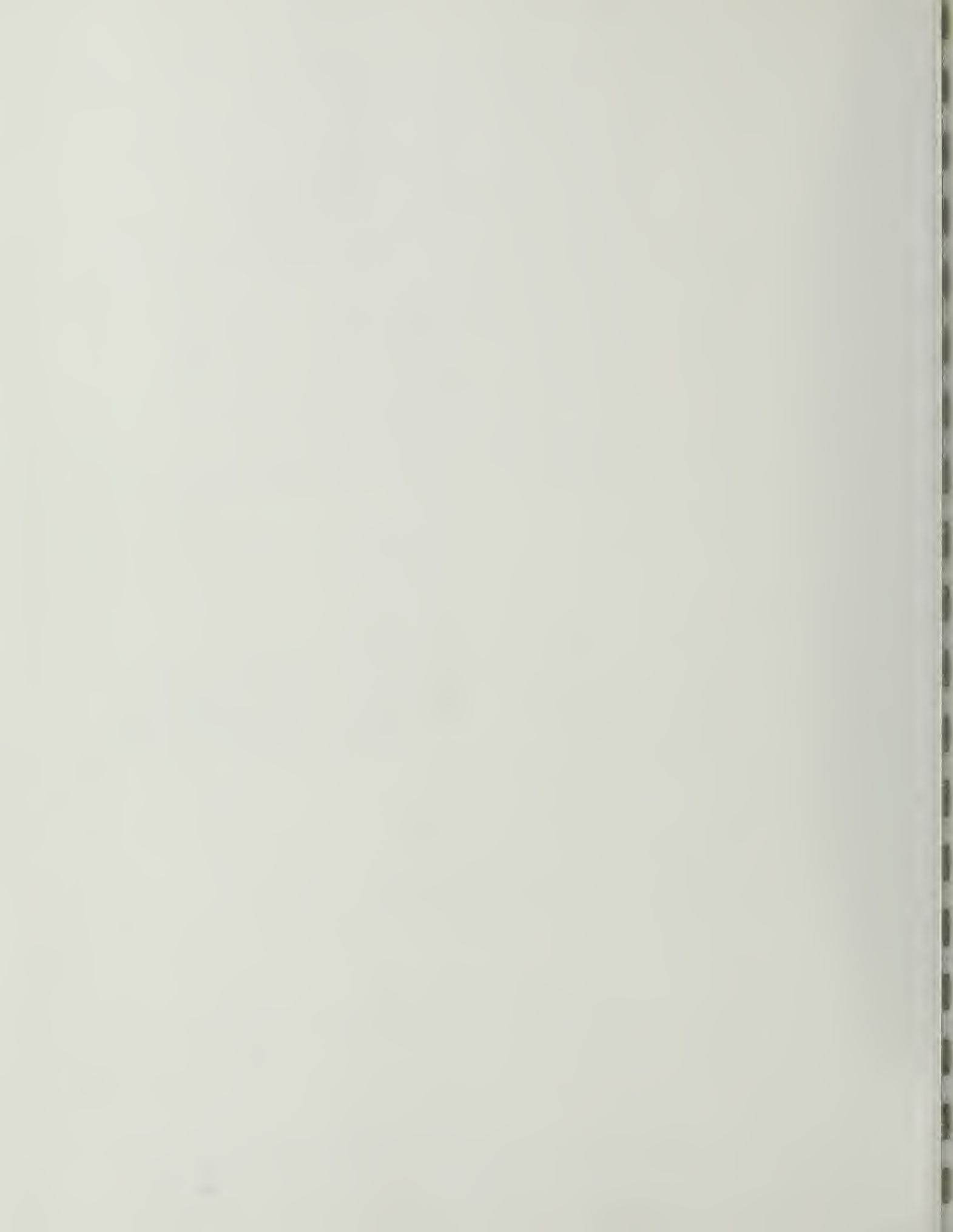
Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
Other spaces, third floor	New offices and staff spaces	The existing third floor is being renovated into the administrative offices of the Museum	Existing spaces vary from relatively original to significantly altered	Existing partitions demolished, new partitions throughout	Not listed	Preservation 2 and 3; one corridor, Preservation 1	The <i>Guidelines</i> recommend "installing permanent partitions in secondary spaces." These spaces vary in their original detailing and hierarchical rank. All of them were originally secondary spaces, and as a group, they are not a distinctive feature which characterizes the building.	Will not affect listed spaces.
Circulation	New circulation scheme, with escalators from new Central Court to second and (new) third floors	The Central Court will be the main internal focus of the Museum and will function as the main lobby for the building. The court will function as the main circulation point with ticket sales, Museum store, Café and group gathering. The main ticket control and access to special exhibitions will be from this space.	Space is now light courts and various interior spaces; primary public circulation is organized around monumental stair S101	Circulation scheme starts at escalators in new Central Court, follows periphery of new third floor and second floor. Greatest physical impact on Rooms 192, 193, 290 and 200. Impact on the use of S101 and 200.	Physical effect on listed spaces limited to 192, 193, 290 and 200. S101 is also listed.	Article 10 Listing	The <i>Guidelines</i> recommend "preserving a floor plan or interior spaces that are important in defining the overall historic character of the building. This includes the size, configuration, proportion, and relationship of rooms and corridors; the relationship of features to spaces; and the spaces themselves..." The new design will significantly change the primary circulation sequence of the building, which is a central characteristic of the original Beaux-Arts part. It will alter the relationship of rooms and corridors. Although the new escalators and Central Court will not directly affect the building's most distinctive features, they trigger important moves such as putting large openings in the walls of Rooms 290 and 210 and eliminating Rooms 192 and 193. See also "Demolition of Elevators."	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i> , which says, "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." The historic circulation scheme includes most of the rooms listed in Appendix J: 191, 101, 190, 192, 193, S201, 290 and 201A. The new design will change the role of these rooms. The Planning Commission and the Landmarks Board will have to decide whether a change in role is an issue under Article 10. Physically, the new circulation scheme generates changes to Rooms, 192, 193, 290, and 210.
	New stair in eastern portion of south wing (primary impact is on Room 210)	This new stair provides required exit egress from South wing of building, see below.	Rooms 210 and 218 are simple Beaux-Arts plans	New exit stair inserted in Room 210 (also in other spaces on other floors, but impact is less important there)	Listed space	Article 10 Listing	The <i>Guidelines</i> recommend against "damaging or destroying character-defining spaces when adding a new code-required stairway." It will damage an important space on the second floor, as well as lesser spaces above and below.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i> , which says, "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, ... where specified in the designation ordinance for a publicly owned landmark, its major interior architectural features." Construction of a stair in Room 210 will damage this listed interior feature.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
	Three new stairs -- in northeast, southwest and northwest zones	The new exit stairs have been located to accommodate the code calculated occupant load for the building and have been placed to disburse the exits on each floor. The code calculated occupant load for the Museum is higher than it was for the Library.	Existing stairs are in different locations	New stairs added for exiting and programmatic circulation	None listed	Existing spaces from Preservation 2 to Preservation 3	The <i>Guidelines</i> recommend "adding a new stairway...in a manner that preserves adjacent character-defining features and spaces." These stairs do not destroy distinctive features which characterize the building. These stairs, and the one in the southeast zone, will be visible change the exterior appearance of the building at the windows, potentially at night if clear glazing and utilitarian lighting are used. As the details are not final, this issue cannot be evaluated now, but should be reviewed when the design is complete.	Will not affect listed spaces. Exterior concerns are similar to those listed under the Secretary's Standards.
	New elevators near northwest stair, and from basement to first floor only on south wing	The new elevators have been added at the locations needed to provide vertical access to the galleries and the service areas of the building.	Variety of other spaces in those locations, including stacks S11 and stair S103	Existing construction removed for new shafts and elevators	None listed	Non-Contributing to Preservation 1	The <i>Guidelines</i> recommend "Placing new code-required stairways or elevators in secondary and service areas." The spaces affected by the new elevators generally fit this description.	Will not affect listed spaces.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
	Demolition of Stairs S1, S2 and S4	The width, location and fire rating of the existing stairs will not work with the Museum's program or meet the current life safety code.	Stairs substantially unchanged from original	Removal to accommodate new spaces and systems	Not listed	Preservation 3 (S1); Preservation 1 (S2 and S4)	"The <i>Guidelines</i> recommend "Enclosing an interior stairway where required by code so that its character is retained" and "Upgrading historic stairways and elevators to meet health and safety codes in a manner that assures their preservation, i.e. so that they are not damaged or obscured." S1 is a service space, not a distinctive feature of the building. S2 and S4 are character-defining features of the building. They will not be upgraded to meet current codes, but will be removed. "The <i>Guidelines</i> recommend "Working with local code officials to investigate systems, methods, or devices of equivalent or superior effectiveness and safety to those prescribed by code so that unnecessary alterations can be avoided." Alternative means of code compliance may be invoked for S101, but not for S2 or S4, which will be removed.	Will not affect listed spaces.
	Demolition of Elevators and dumbwaiters	The size of the cabs, the capacity, type of equipment and location will not work for the Museum's program that includes not only the movement of people but of art to the gallery floors.	Elevators E2 and E3 historic; E1 not historic; dumbwaiters in 203 and ST1 historic	All to be removed	Room 203 is listed; Planning Code does not enumerate individual elements	Non-Contributing (E1); Preservation 1 (E2); Very Significant (dumbwaiter ST1); Significant (dumbwaiter 203); Preservation 3 (E3)	<i>Standard</i> 5 says, "Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved." As a group, these elevators and dumbwaiters are a distinctive feature which characterizes the building. The entire group will be removed. Removal of E2 is related to the new circulation scheme, which is discussed above.	Will not affect listed spaces.

Location: Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
Building Systems	Fire-sprinklers	The building is required to have fire sprinklers in order to bring the building up to current life safety code.	No fire-sprinklers	Fire-sprinklers installed throughout building	System covers all spaces	System covers all spaces	The <i>Guidelines</i> recommend "installing sensitively designed fire suppression systems, such as sprinkler systems that result in retention of historic features and finishes." The concealed sprinkler system will protect the building without negative effects on major features.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i> , which says "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, the ... landmark." The sprinkler system will preserve and enhance the building, and will not damage it.
	Other building systems	The Museum has very stringent requirements for temperature and humidity control in all areas where art is present. The existing building systems contain hazardous materials and are antiquated and do not have the capacity or the controls to meet the program requirements of the Museum.	Heating, electrical and plumbing systems are original, with many changes	All-new MEP systems, mostly new lighting	System covers all spaces	System covers all spaces	The <i>Guidelines</i> recommend "installing a completely new mechanical system if required for the new use so that it causes the least alteration possible to the building's floor plan, the exterior elevations, and the least damage to the historic building material." Although there are mechanical shafts in areas where original partitions have been removed, the changes in partitions relate mostly to architectural design and not to building systems. Historically important lighting will be retained in spaces which are being preserved. This aspect of the design should be reviewed again when the construction documents are complete.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i> , which says "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, the ... landmark." The mechanical, electrical and plumbing systems will preserve and enhance the building, and will not damage it. This aspect of the design should be reviewed again when the construction documents are complete.

Location: Exterior and Interior	Design Element	Program Requirement	Existing Condition	Change	Article 10 Designation	P&T HSR Rating	Secretary's Standards	Article 10
Structural Design	Basic isolation	The Museum's program for seismic safety is that in the event of a great earthquake no more than 1% of the value of the collection may display and none of the collection in storage can be damaged. The only structural system that can meet this requirement with the fragile nature of the objects in the collection is base isolation.	Fixed foundation is original	Existing columns will be cut off, new foundations added, flexible isolators installed and connected to columns; most at exterior will allow building to move independently of the ground in order to reduce lateral forces	Exterior of building included in Article 10 listing; base isolation does not affect listed interior spaces	Exterior rated Article 10 Listing, interior affects basement -- rated Non-Contributing	The <i>Guidelines</i> recommend "Correcting structural deficiencies in preparation for the new use in a manner that preserves the structural system and individual character-defining features." Base isolation reduces the structural changes required above the foundation, compared to a "conventional" fixed-base seismic upgrade. The seismic design required for the art collection will protect the historic resource and the people who occupy it. This aspect of the design should be reviewed again when the construction documents are complete.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i>, which says "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, the ... landmark." The seismic upgrade enhances the historic building by protecting it from earthquake damage. Does not destroy significant interior or exterior architectural features of the building. This aspect of the design should be reviewed again when the construction documents are complete.
	Shear walls	The structural design requires the introduction of shear walls within the building.	Conventional steel framing	New concrete shear walls, at all stories, in walls of Rooms 200, 218, 202 and 203 (impact in these rooms discussed here; impact on other floors is less because spaces are rated lower) The design requires removal and replacement of some interior finishes (especially around Rooms 202, 203 and 218) and demolition of large areas of exterior brick wall adjacent to faux-travertine which is to remain (especially in Room 200).	Affects all floors, including listed Rooms 200, 218, 202 and 203 (impact in these rooms discussed here; impact on other floors is less because spaces are rated lower)	Article 10 Listing (other rooms with lower ratings would also be affected)	The <i>Guidelines</i> recommend against "Radically changing interior spaces or damaging or destroying features or finishes that are character-defining while trying to correct structural deficiencies in preparation for the new use." Methods of protection, removal and replacement are not finalized. The final design must be evaluated to determine compliance.	Article 10, Appendix J, Section 10 (b) invokes Section 1006.7(b) of the <i>Planning Code</i>, which says "the proposed work shall preserve, enhance or restore, and shall not damage or destroy, the ... landmark." The design is not complete; it will comply with Article 10 if it does not damage the finishes in the listed spaces affected. This cannot be determined until the final design is complete.



EXISTING HISTORICAL ROOM LEGEND

- 101 ENTRANCE HALL
- 102 LUNGE ROOM
- 103 STAFF ROOM
- 104 OFFICE
- 105 VESTIBULE
- 107A OFFICE
- 107B OFFICE
- 108 OFFICE
- 109 OFFICE
- 110 OFFICE
- 111 MEN'S RESTROOM
- 112 STAR VESTIBULE
- 113 STAFF RESTROOM
- 114 CHILDREN'S READING ROOM
- 115 STORAGE
- 116 OFFICE
- 117 OFFICE
- 117A STORAGE
- 117B STORAGE
- 117C OFFICE
- 117D OFFICE
- 118 OFFICE
- 119 BUSINESS DEPT
- 120 WOMEN'S RESTROOM
- 121 CORRIDOR
- 122 CORRIDOR
- 123 CORRIDOR
- 124 VESTIBULE
- 125 ELEVATOR LOBBY
- 126 CORRIDOR
- 127 SHEET MUSIC DEPT
- 128 OFFICE
- 129 CORRIDOR
- 130 JANITOR CLUST
- 131 SIDE LOBBY
- 132 STAFF RESTROOM
- 133 STAFF RESTROOM
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SHEET NOTES

1. REMOVE ALL MECHANICAL/ELECTRICAL/PLUMBING AND ASSOCIATED PIPING
2. REMOVE ALL EXISTING INTERIOR PARTITIONS, DOORS AND STAIRS
3. REMOVE ALL EXISTING FINISHES EXCEPT IN HISTORICAL AREAS AS NOTED
4. REMOVE ALL LOBBY LEVEL SLAB TO TOP OF STRUCTURAL FLOORING
5. REMOVE ALL EXISTING INTERIOR PARTITIONS, DOORS AND ASSOCIATED FINISHES

SYMBOLS LEGEND

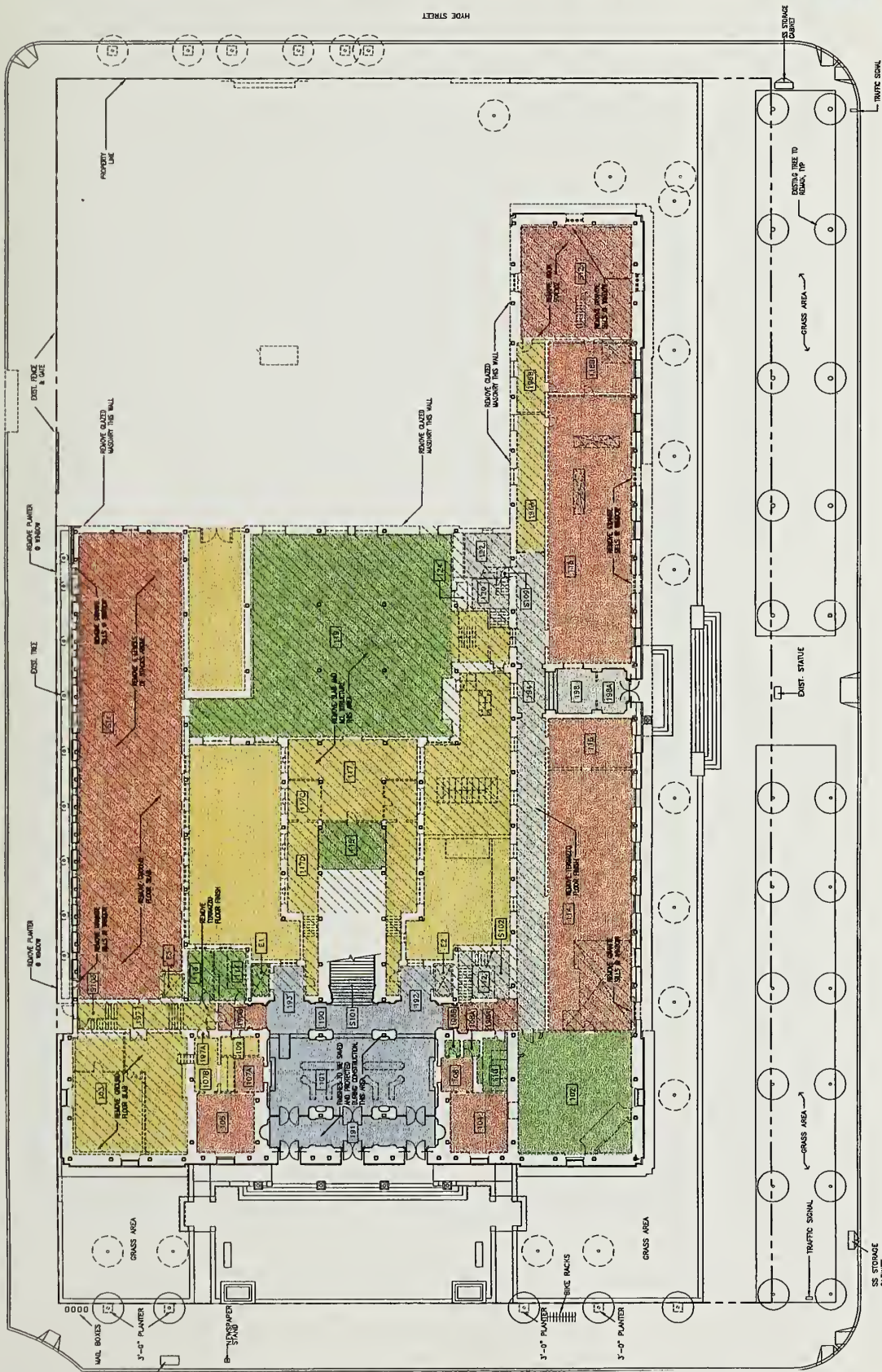
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- PRESERVATION ZONE 2 *
- PRESERVATION ZONE 3 *
- NON-CONTRIBUTING *
- * EXISTING PACE & TURNBULL OLD MAN LIBRARY HISTORIC STRUCTURE REPORT

ASMA ART MUSEUM
200 East Street
New York, NY 10003
COMMUNICATED BY STATE
DEPARTMENT OF CULTURAL AFFAIRS

AUGUST 6, 1983

GROUND LEVEL EXISTING/DEMOLITION PLAN

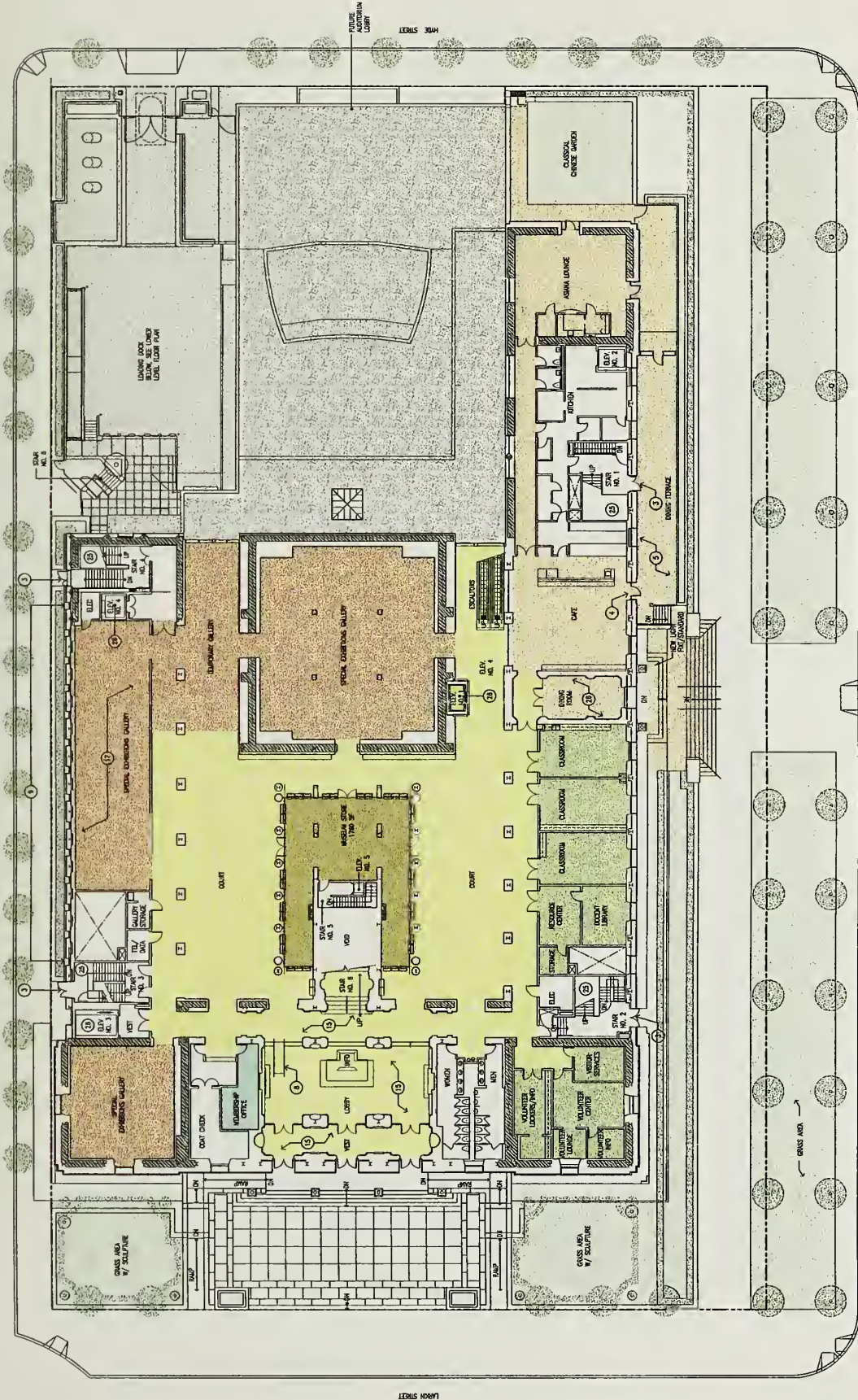
H.O.K. / L.O.A. / R.W.A. • Joint venture in association with East Arch Geo Architect, P.A.C.

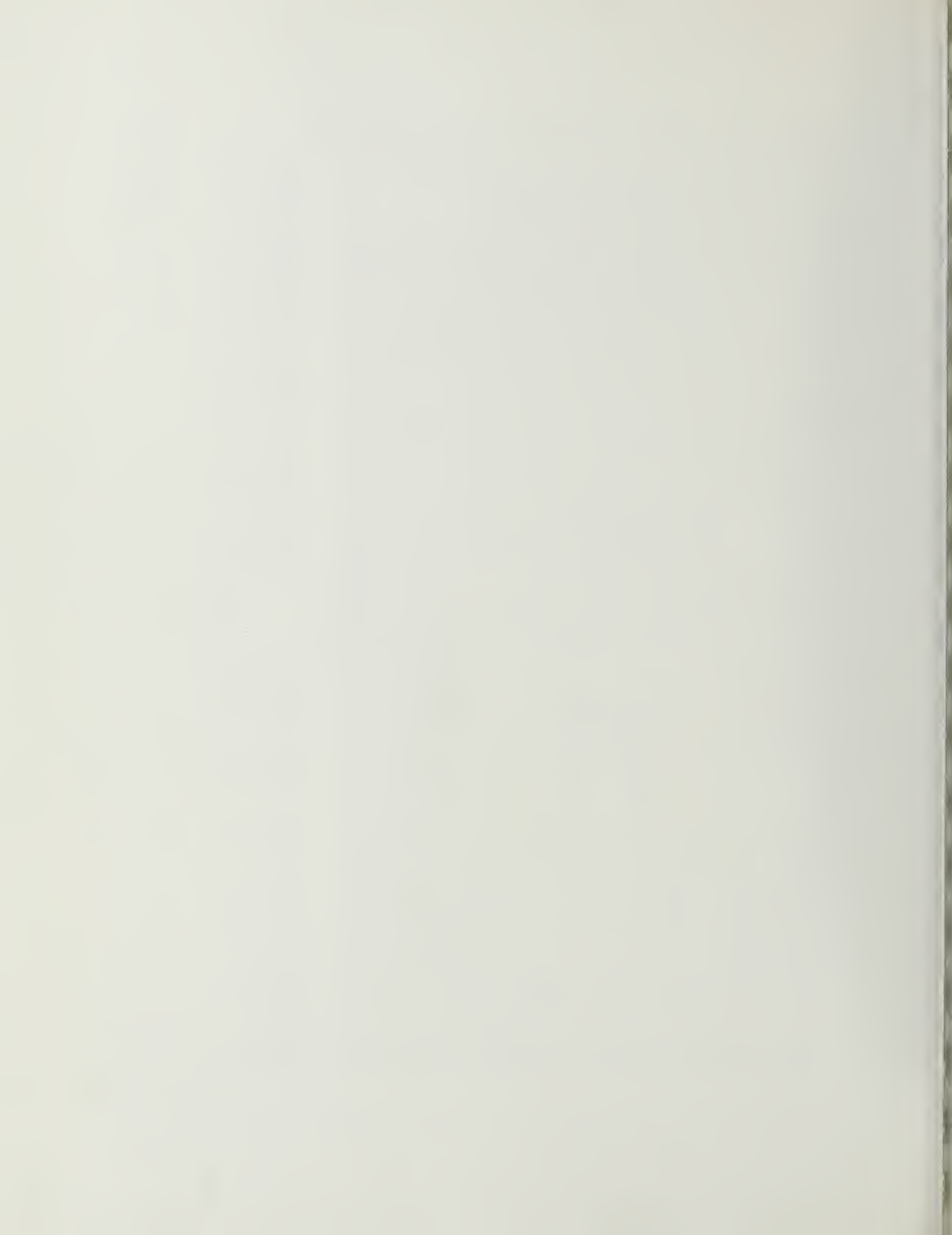


GROUND LEVEL - PROPOSED

HOK / LOA / RWA is joint venture in association with Dick, Arch, Cass Auland, F&A

NOTE: FOR DESIGN ELEMENTS SECOND REFER TO LOWER LEVEL DRAWING 2.





200	MAIN CATALOG ROOM
201	READING ROOM
202	READING ROOM
203	OFFICE
204	OFFICE
205	OFFICE
206	OFFICE
207	OFFICE
208	OFFICE
209	OFFICE
210	GENERAL READING ROOM
211	GENERAL READING ROOM
212	OFFICE
213	OFFICE
214	OFFICE
215	OFFICE
216	OFFICE
217	OFFICE
218	COMPUTER ROOM
219	READING ROOM
220	MAIN STAIR HALL
221	CORRIDOR
222	CORRIDOR
223	SUPPLY CLOSET
224	SERVICE CORRIDOR
225	STAIRS
226	MAIN FLOOR
227	STAIRS (LEVEL 2-1)
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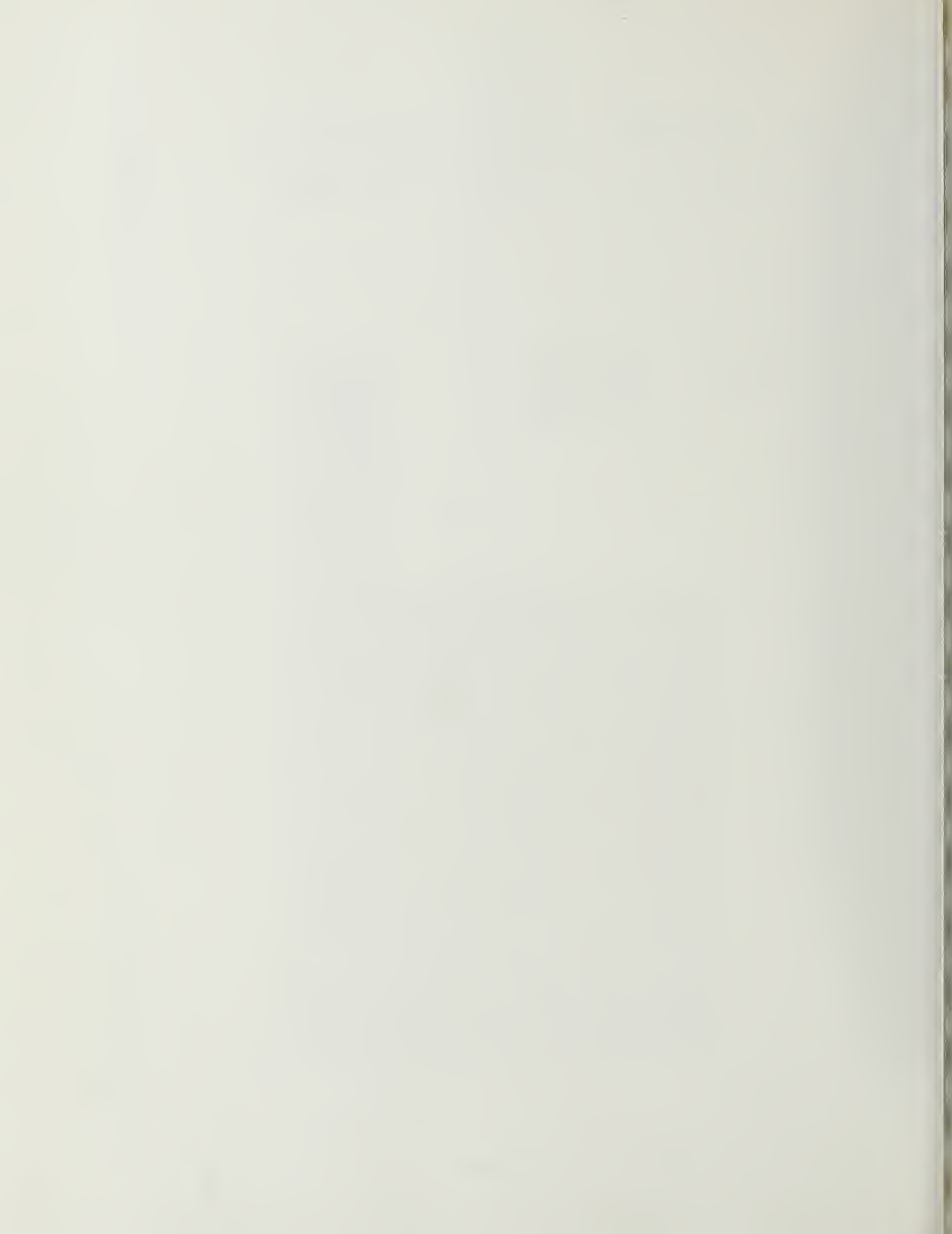
1. REMOVE ALL PLUMBING/MECHANICAL/ELECTRICAL EQUIPMENT AND ASSOCIATED PIPING WITHOUT DAMAGING PROTECTED FINISHES/FURNISHES IN RESIDENTIAL AREAS
2. REMOVE ALL WOOD INTERIOR PARTITIONS, DOORS AND INTERIOR PERIMETER PLASTER FINISH WALLS AT ALL WALLS (FOR NEW LOCATION, VAPOR BARRIER AND FIRE TREATMENT PLUMBED AT ALL EXISTING WALLS)
3. PROTECT EXISTING FINISHES/FURNISHES IN AREAS 201, 202, 210, 211 AND 212. ADDITIONALLY, PROTECT AND SAVE CEILING IN AREAS 201, 202, 210 AND 211 FOR ADDITIONAL NOTES AND INFORMATION. SEE SHEET 4.29-3A AND 4.29-4A.
4. REMOVE WOOD CEILING/ROOF/CESSES IN AREAS 201, 202, 210 AND 212

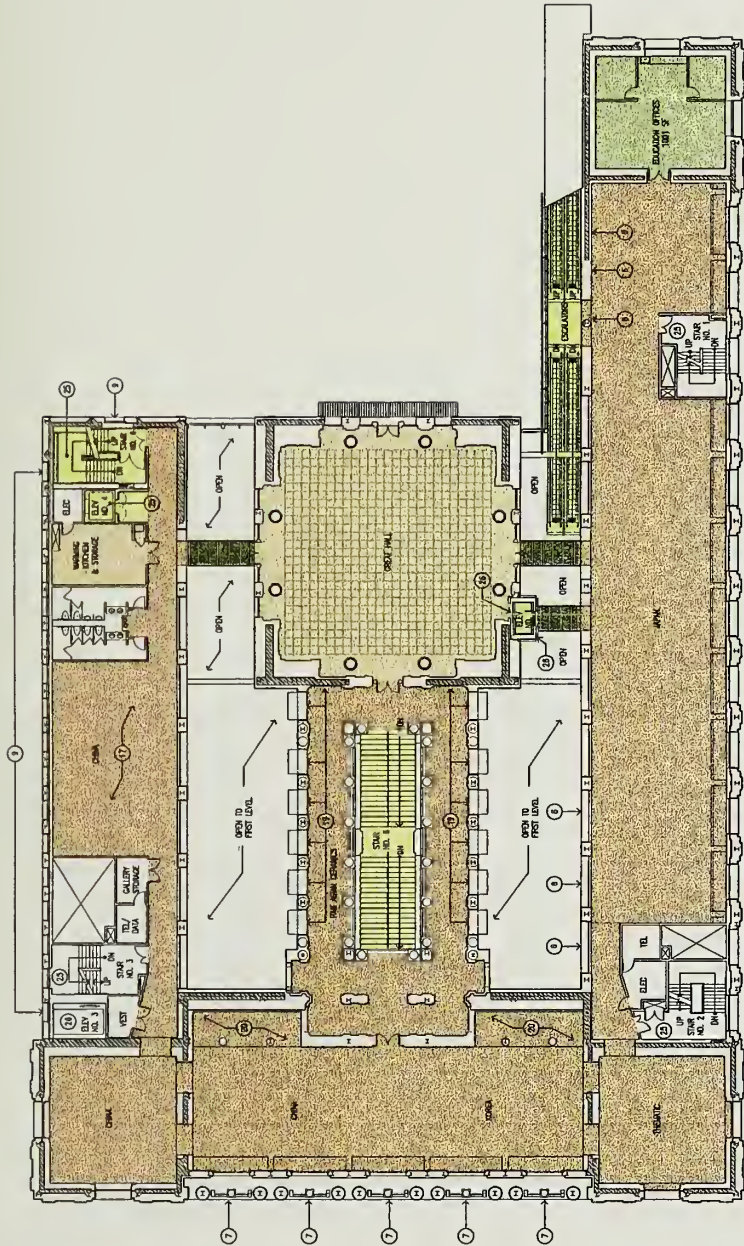
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=====	EXISTING TO REMAIN
	EXTENT OF DEMOLITION
----	PROPERTY LINE
	ARTICLE 10 LISTING
	SF PLANNING CODE
	PRESERVATION ZONE 1 *
	PRESERVATION ZONE 2 *
	PRESERVATION ZONE 3 *
	NON-CONTRIBUTING *

• PER PAGE & TURNBULL
OLD MAIN LIBRARY
HISTORIC STRUCTURE REPORT



HOK / LOA / RWA a joint venture in association with Dillisch, Oetzel & Autenell, FAIA





DESIGN ELEMENTS LEGEND

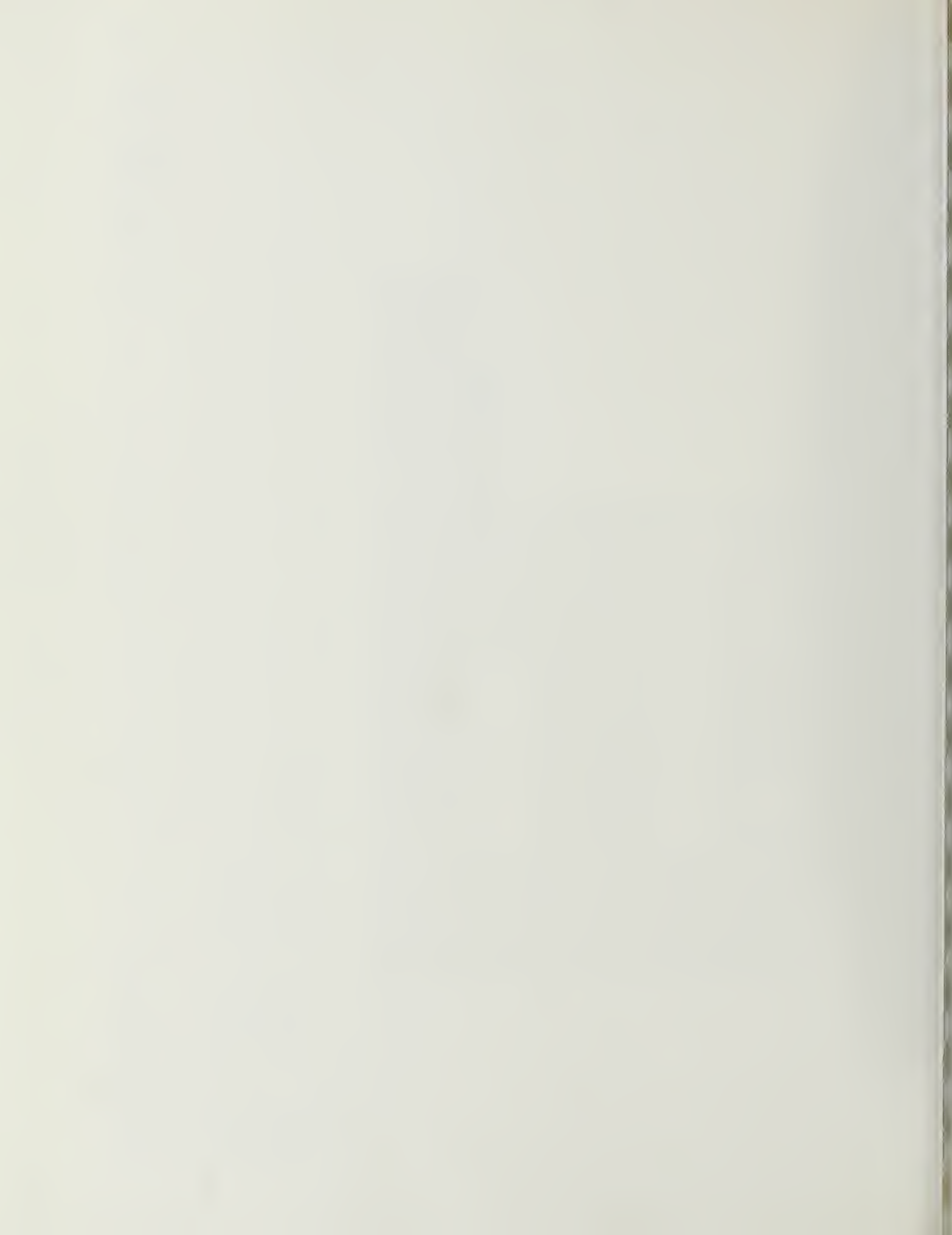
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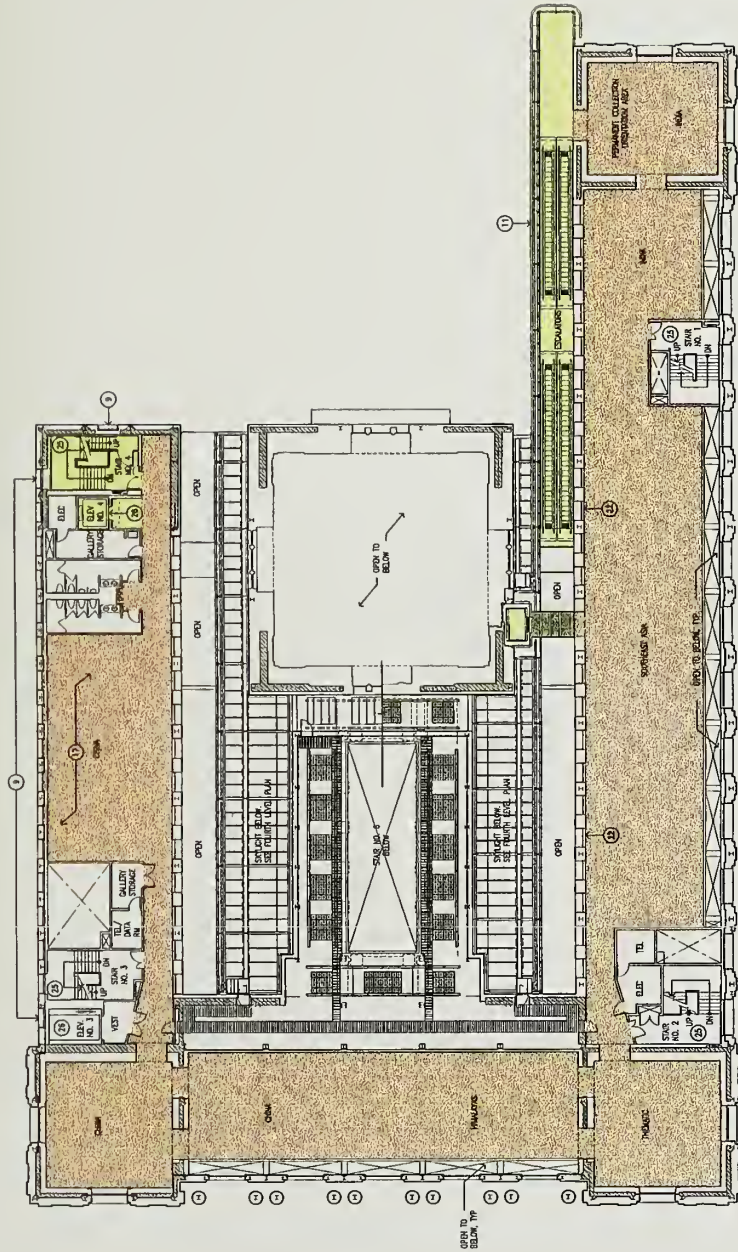
NOTE: ABOVE DESIGN ELEMENTS ARE REPRODUCED IN THE HISTORIC STRUCTURE REPORT BY PAGE 4. TURNBULL. SEE PRELIMINARY ASSESSMENT: IMPACT ON ASIAN ART MUSEUM DESIGN ON HISTORIC STRUCTURES AND WALK | PEARLY WATER

Circulation **Gallery** **Education** **Great Hall**

SECOND LEVEL - PROPOSED

HOK / LDA / RWA a joint venture in association with Oetl Archt. Ours Aubert, FAJA





DESIGN ELEMENTS LEGEND

1. NEW UP-ROOF SHELTERS
2. NEW HALL CORRIDOR
3. NEW DOT ROOMS
4. NEW ROOMS TO OUTDOOR DINING TERRACE
5. NEW DINING TERRACE
6. REPAIRS OF MASONRY WALLS
7. REPAIRS OF STAIRS
8. INTERIOR MUSEUMS RAMP
9. NEW SPANIAL GLASS AWNING
10. REPAIRS OF GLAZED MASONRY REPLACED WITH STAINLESS STEEL
11. NEW GLASS-ENCLOSED AVENUE AND STAIRS
12. LOWER LEVEL AVENUE WITH SERVICE YARD
13. CLEANING AND REPAIRS OF EXISTING STAIRS
14. BASE EXCAVATION WITH REINFORCED MORTAR COVERS
15. HISTORIC ROOMS 101, 102, AND 103 RESTORED
16. HISTORIC ROOM 104, RESTORED WITH NEW FLOOR
17. CONVERSION OF STAIRS TO GALLERY
18. NEW FLOOR (AND LIFT)
19. REMOVAL OF MURALS AT STAIR LOCCA
20. ALTERATION OF EXISTING CORRIDOR INTO GALLERY
21. NEW ELEVATOR PARTIALLY OPEN HALL TO ORIGINAL CORRIDOR
22. NEW ELEVATOR PARTIALLY OPEN HALL TO ORIGINAL CORRIDOR
23. NEW LIBRARY AND DOCUMENTS CENTER ON FOURTH LEVEL
24. NEW OFFICE AND STAFF SPACES
25. NEW DOT STAIR
26. NEW ELEVATOR

NOTE: ABOVE DESIGN ELEMENTS ARE INTRODUCED IN THE HISTORIC STRUCTURE REPORT BY PAGE & TURNBULL. SEE PRELIMINARY ASSUMPTIONS: IMPACT ON ASIAN ART MUSEUM DESIGN ON HISTORIC RESOURCES, OLD MAIN LIBRARY WINGS.

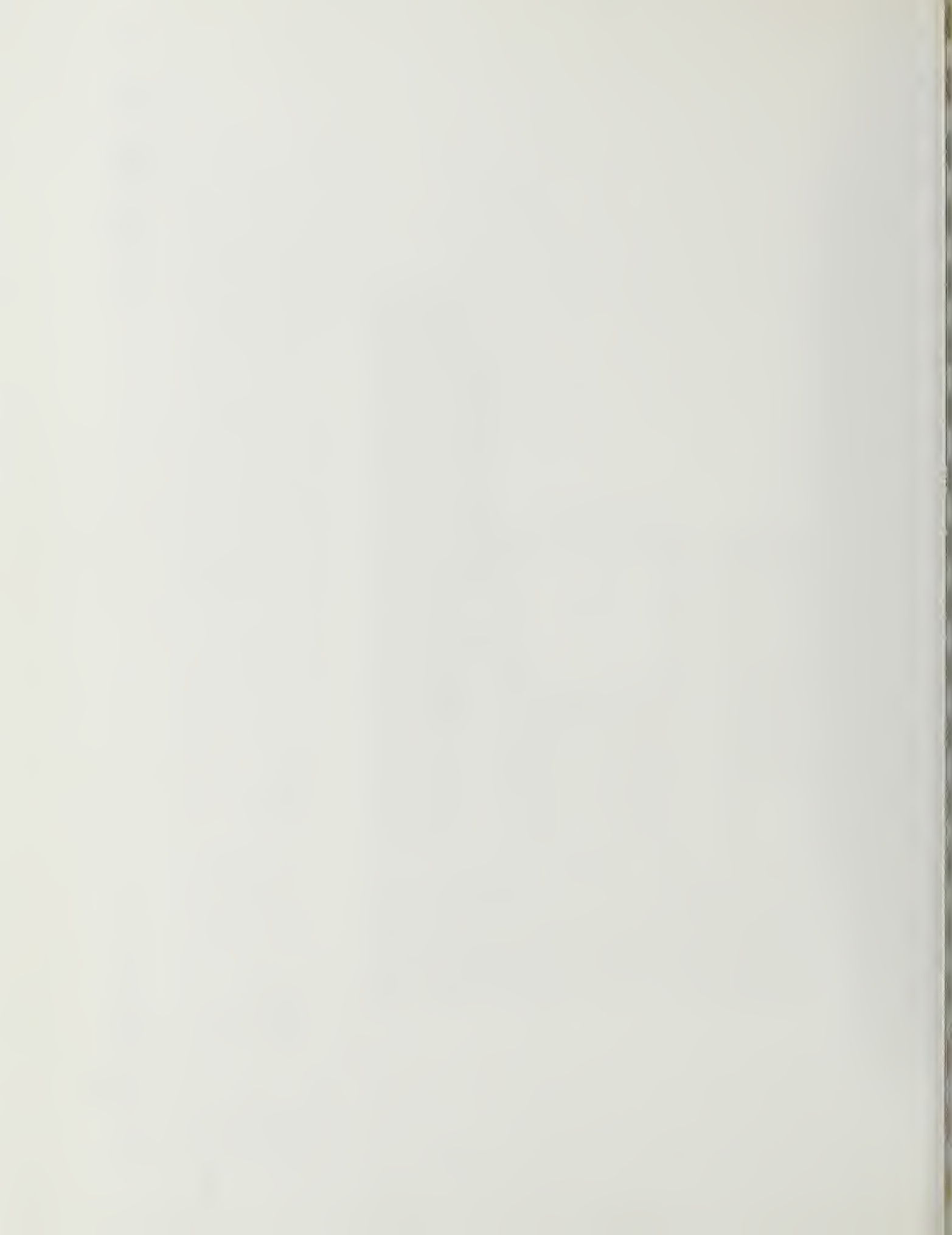
 Circulation  Gallery

THIRD LEVEL - PROPOSED NEW LEVEL

NOV / 10 / 11 / 12 / 13 / 14 / 15 / 16 / 17 / 18 / 19 / 20 / 21 / 22 / 23 / 24 / 25 / 26 / 27 / 28 / 29 / 30 / 31 / 32 / 33 / 34 / 35 / 36 / 37 / 38 / 39 / 40 / 41 / 42 / 43 / 44 / 45 / 46 / 47 / 48 / 49 / 50 / 51 / 52 / 53 / 54 / 55 / 56 / 57 / 58 / 59 / 60 / 61 / 62 / 63 / 64 / 65 / 66 / 67 / 68 / 69 / 70 / 71 / 72 / 73 / 74 / 75 / 76 / 77 / 78 / 79 / 80 / 81 / 82 / 83 / 84 / 85 / 86 / 87 / 88 / 89 / 90 / 91 / 92 / 93 / 94 / 95 / 96 / 97 / 98 / 99 / 100 / 101 / 102 / 103 / 104 / 105 / 106 / 107 / 108 / 109 / 110 / 111 / 112 / 113 / 114 / 115 / 116 / 117 / 118 / 119 / 120 / 121 / 122 / 123 / 124 / 125 / 126 / 127 / 128 / 129 / 130 / 131 / 132 / 133 / 134 / 135 / 136 / 137 / 138 / 139 / 140 / 141 / 142 / 143 / 144 / 145 / 146 / 147 / 148 / 149 / 150 / 151 / 152 / 153 / 154 / 155 / 156 / 157 / 158 / 159 / 160 / 161 / 162 / 163 / 164 / 165 / 166 / 167 / 168 / 169 / 170 / 171 / 172 / 173 / 174 / 175 / 176 / 177 / 178 / 179 / 180 / 181 / 182 / 183 / 184 / 185 / 186 / 187 / 188 / 189 / 190 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AUGUST 8, 1988



EXISTING HISTORICAL ROOM LEGEND

301	PERIODICAL ROOM
302	OFFICE
303	STAFF LOUNGE
303A	ANTEROOM (UNKNOWN)
304	ANTEROOM
305	STAFF LOUNGE
306	CLOSET
307	STAFF KITCHEN
308	CLOSET
309	STAFF RESTROOM
310	STAFF RESTROOM
310A	OFFICE
311	OFFICE
311A	LOCKER ROOM
312	VAULT
313	LOUNGE
314	OFFICE
315	OFFICE
316	OFFICE
317	OFFICE
318	OFFICE
319	OFFICE
320	RESTROOM
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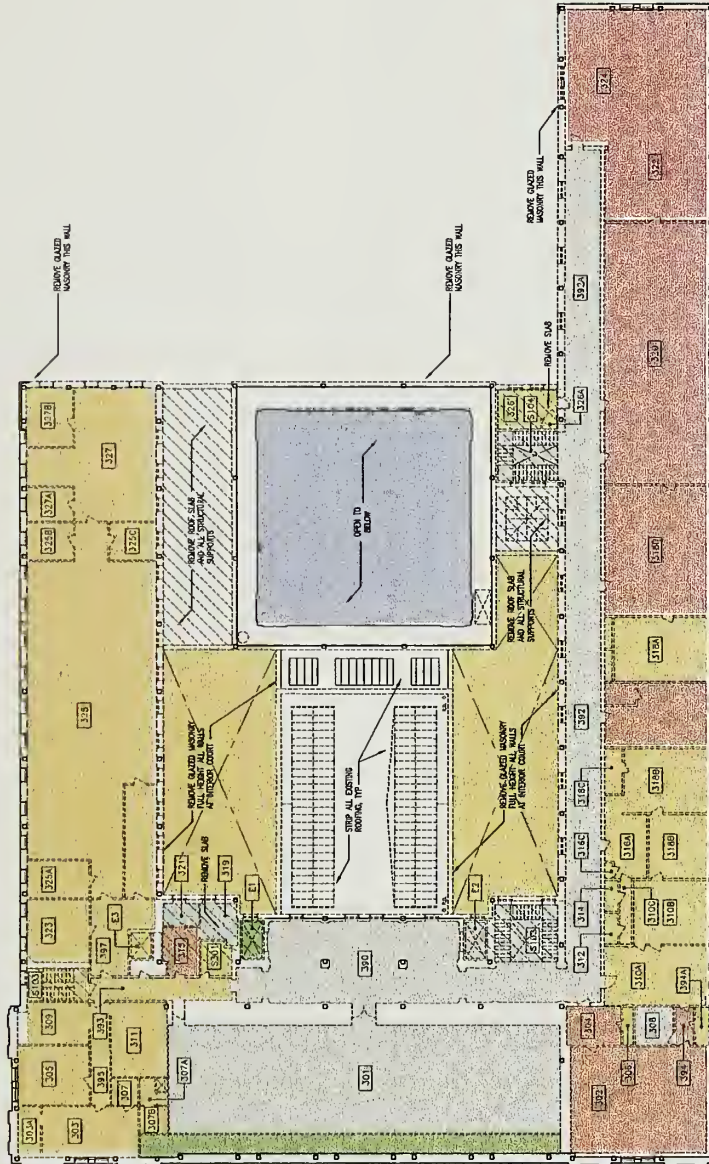
SHEET NOTES

1. REMOVE ALL FURNITURE/ARCHITECTURAL/ELECTRICAL EQUIPMENT AND MATERIALS FROM THE ROOMS.
2. REMOVE ALL INTERIOR PARTITIONS, DOORS AND WINDOWS/PARTITIONS, PLASTER, GYPSUM WALLS, FLOORING, CEILING, AND WOOD BARRIER ACCESS.
3. REMOVE ALL CEILING FINISHES.

SYMBOLS LEGEND

=====	EXISTING TO BE REMOVED
=====	EXISTING TO REMAIN
=====	EXTENT OF DEMOLITION
-----	PROPERTY LINE
=====	ARTICLE 10 LISTING OF PLANNING CODE
=====	PRESERVATION ZONE 1 *
=====	PRESERVATION ZONE 2 *
=====	PRESERVATION ZONE 3 *
=====	NON-CONTRIBUTING *

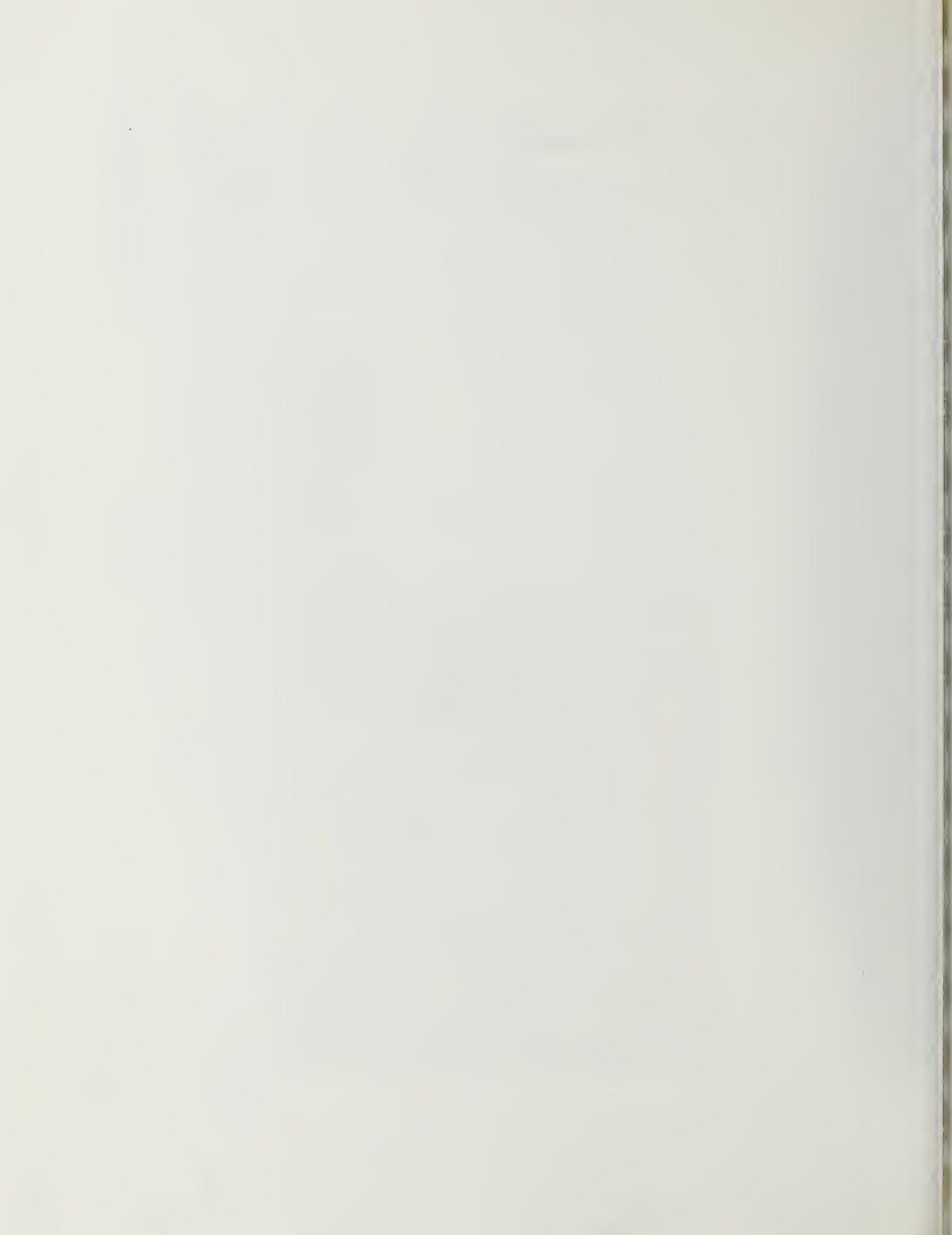
* PER PAGE & TURNBULL
OLD MAN HISTORIC
HISTORIC STRUCTURE REPORT

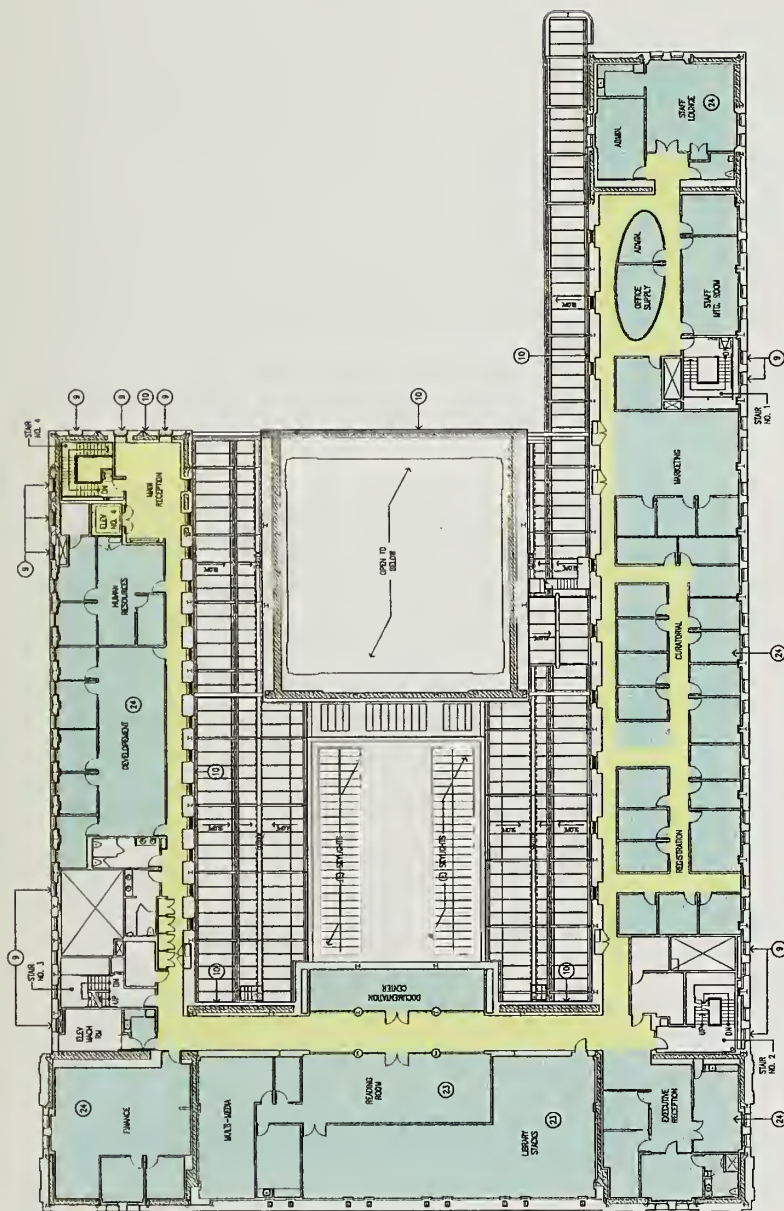


THIRD LEVEL EXISTING/DEMOLITION PLAN

NOV / 10A / RWA - A joint venture in association with Ball, Arch, Goss, Aulenti, F&A







DESIGN ELEMENTS LEGEND

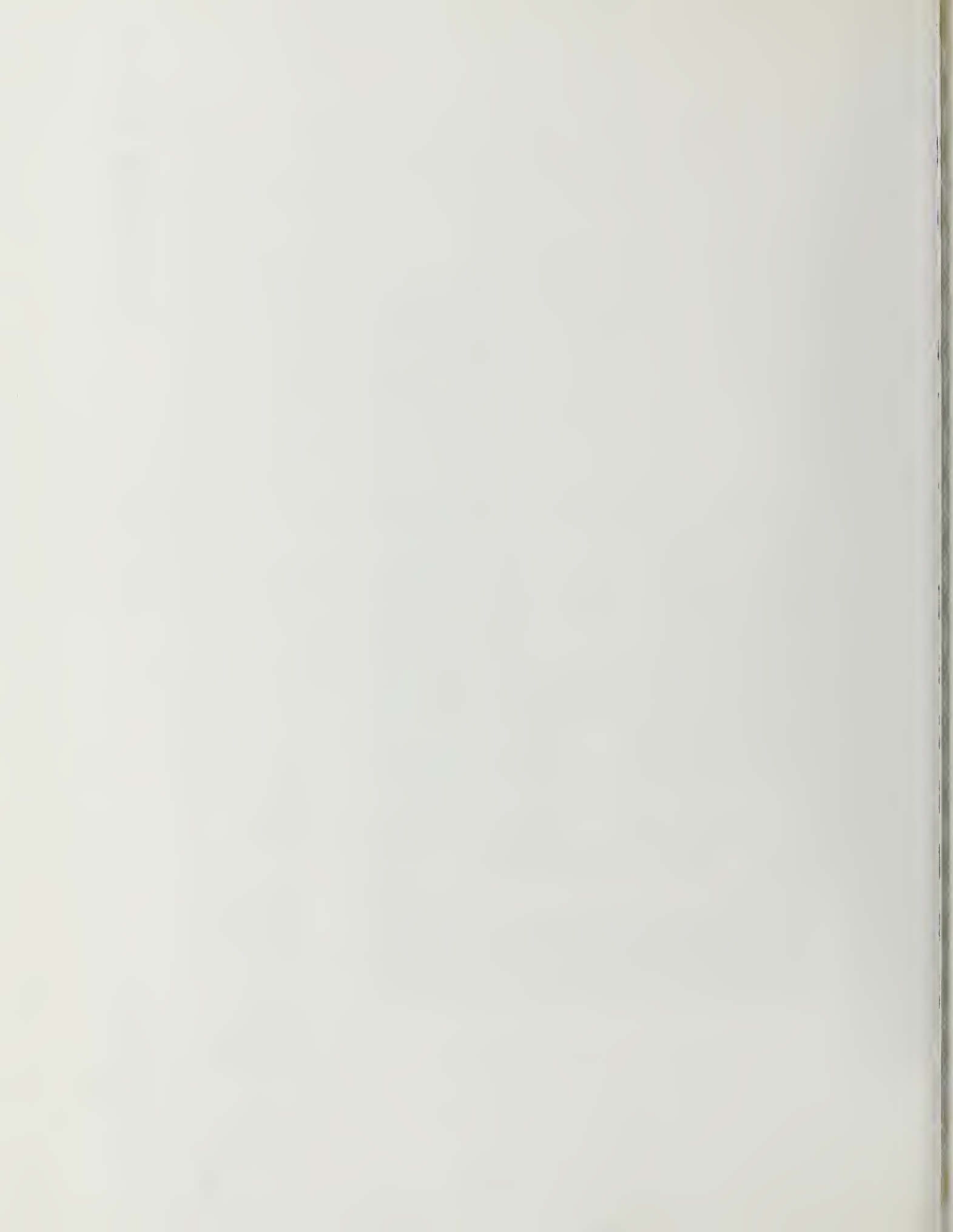
- | | | | |
|--|---|---|--|
| 1. NEW TOP-RAISE STUDIES | 9. NEW SPANIAL GLASS, WINDSCREEN | 16. INTERIOR ROOM 104, REDWOOD WITH NEW FLOOR | 23. NEW LAMPING AND DECORATIVE CENTER ON FIFTH FLOOR |
| 2. NEW FINE EQUIPMENT | 10. EXTERNAL OF GLASS WINDSCREEN, REPLACED WITH STAINLESS STEEL | 17. CONVERSION OF STUCKS TO GALLERY | 24. NEW OFFICE AND STAFF SPACES |
| 3. NEW EAT ROOMS | 11. NEW GLASS-DOORDED KITCHEN AND STOVES | 18. NEW FLOOR (2ND LEVEL) | 25. NEW EAT STAIR |
| 4. NEW DOORS TO ENTRANCE LOBBY TERRACE | 12. LOWER LEVEL KITCHEN WITH SERVICE STOVE | 19. REMOVAL OF WHEELS AT SPIRIT LOCCA | 26. NEW ELEVATOR |
| 5. NEW DINING TERRACE | 13. CLEANING AND REPAIR OF ENTRANCE STAIRS | 20. ALTERATION OF EXISTING CORRIDOR AND GALLERY | |
| 6. REMOVAL OF WINDSCREEN WINDOWS | 14. BASE SOLUTION WITH REFINISHED WAX | 21. NEW ELEVATOR RAILWAY WITH GREAT HALL | |
| 7. REMOVAL OF STAIRS | 15. HISTORIC ROOMS 101, 102, AND 103. | 22. NEW DRINKING ROOM SOUTH GALLERY | |
| 8. REDWOOD WHEELCHAIR RAMP | | | |

NOTE: ABOVE DESIGN ELEMENTS ARE REPRODUCED IN THE HISTORIC STRUCTURE REPORT BY PAGE & TURNBULL, SEE PRELIMINARY ASSESSMENT; IMPACT ON ASIAN ART MUSEUM DESIGN ON HISTORIC RESOURCES, OLD MAN LIBRARY WATKIN

	Circulation	Administration
1. <i>Journal of the American Medical Association</i>	100,000	100,000
2. <i>Medical Record</i>	80,000	80,000
3. <i>Annals of the American Academy of Medicine</i>	60,000	60,000
4. <i>Journal of the American Medical Association</i>	50,000	50,000
5. <i>Medical Record</i>	40,000	40,000
6. <i>Annals of the American Academy of Medicine</i>	30,000	30,000
7. <i>Journal of the American Medical Association</i>	20,000	20,000
8. <i>Medical Record</i>	10,000	10,000
9. <i>Annals of the American Academy of Medicine</i>	5,000	5,000
10. <i>Journal of the American Medical Association</i>	2,000	2,000
11. <i>Medical Record</i>	1,000	1,000
12. <i>Annals of the American Academy of Medicine</i>	500	500
13. <i>Journal of the American Medical Association</i>	200	200
14. <i>Medical Record</i>	100	100
15. <i>Annals of the American Academy of Medicine</i>	50	50
16. <i>Journal of the American Medical Association</i>	20	20
17. <i>Medical Record</i>	10	10
18. <i>Annals of the American Academy of Medicine</i>	5	5
19. <i>Journal of the American Medical Association</i>	2	2
20. <i>Medical Record</i>	1	1
21. <i>Annals of the American Academy of Medicine</i>	0.5	0.5
22. <i>Journal of the American Medical Association</i>	0.2	0.2
23. <i>Medical Record</i>	0.1	0.1
24. <i>Annals of the American Academy of Medicine</i>	0.05	0.05
25. <i>Journal of the American Medical Association</i>	0.02	0.02
26. <i>Medical Record</i>	0.01	0.01
27. <i>Annals of the American Academy of Medicine</i>	0.005	0.005
28. <i>Journal of the American Medical Association</i>	0.002	0.002
29. <i>Medical Record</i>	0.001	0.001
30. <i>Annals of the American Academy of Medicine</i>	0.0005	0.0005
31. <i>Journal of the American Medical Association</i>	0.0002	0.0002
32. <i>Medical Record</i>	0.0001	0.0001
33. <i>Annals of the American Academy of Medicine</i>	0.00005	0.00005
34. <i>Journal of the American Medical Association</i>	0.00002	0.00002
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37. <i>Journal of the American Medical Association</i>	0.000002	0.000002
38. <i>Medical Record</i>	0.000001	0.000001
39. <i>Annals of the American Academy of Medicine</i>	0.0000005	0.0000005
40. <i>Journal of the American Medical Association</i>	0.0000002	0.0000002
41. <i>Medical Record</i>	0.0000001	0.0000001
42. <i>Annals of the American Academy of Medicine</i>	0.00000005	0.00000005
43. <i>Journal of the American Medical Association</i>	0.00000002	0.00000002
44. <i>Medical Record</i>	0.00000001	0.00000001
45. <i>Annals of the American Academy of Medicine</i>	0.000000005	0.000000005
46. <i>Journal of the American Medical Association</i>	0.000000002	0.000000002
47. <i>Medical Record</i>	0.000000001	0.000000001
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53. <i>Medical Record</i>	0.00000000001	0.00000000001
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61. <i>Journal of the American Medical Association</i>	0.00000000000002	0.00000000000002
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66. <i>Annals of the American Academy of Medicine</i>	0.0000000000000005	0.0000000000000005
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69. <i>Annals of the American Academy of Medicine</i>	0.00000000000000005	0.00000000000000005
70. <i>Journal of the American Medical Association</i>	0.00000000000000002	0.00000000000000002
71. <i>Medical Record</i>	0.00000000000000001	0.00000000000000001
72. <i>Annals of the American Academy of Medicine</i>	0.000000000000000005	0.00

FOURTH LEVEL - PROPOSED

MOX / LOA / RWA a joint venture in association with Dad, Arch, Gen, Aulard, FLAA

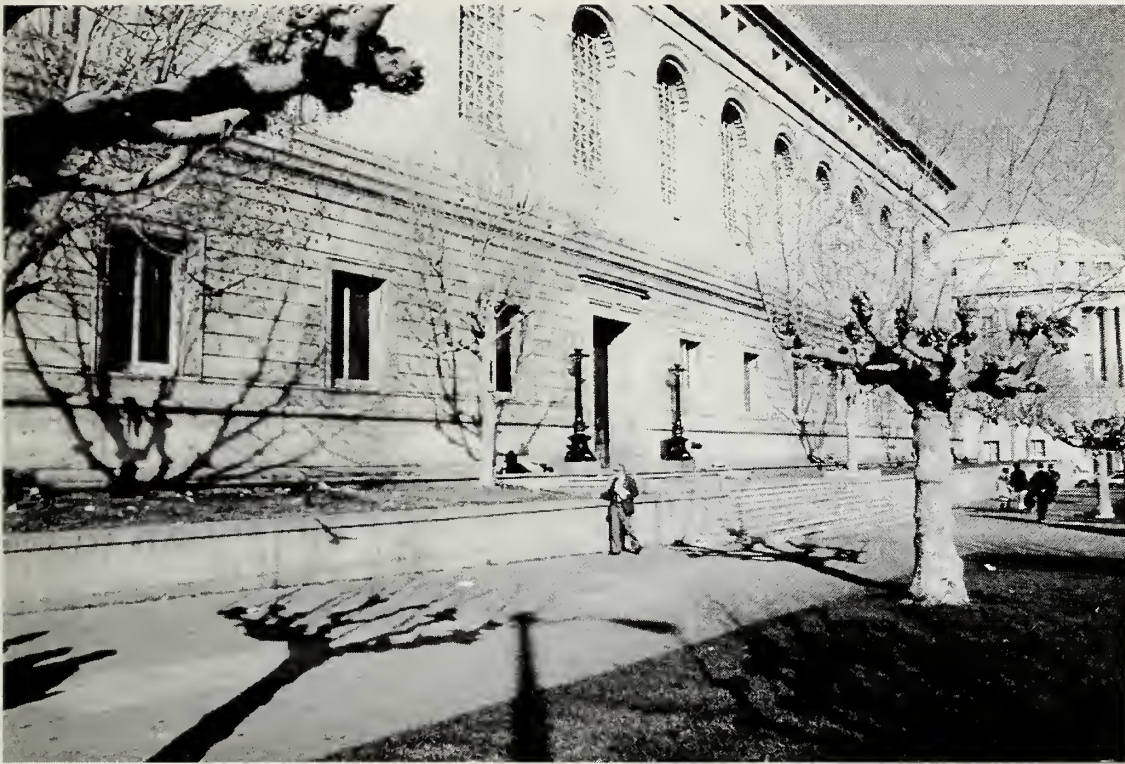




Larkin Street facade



Rear view from McAllister and Hyde



Fulton Street Elevation.

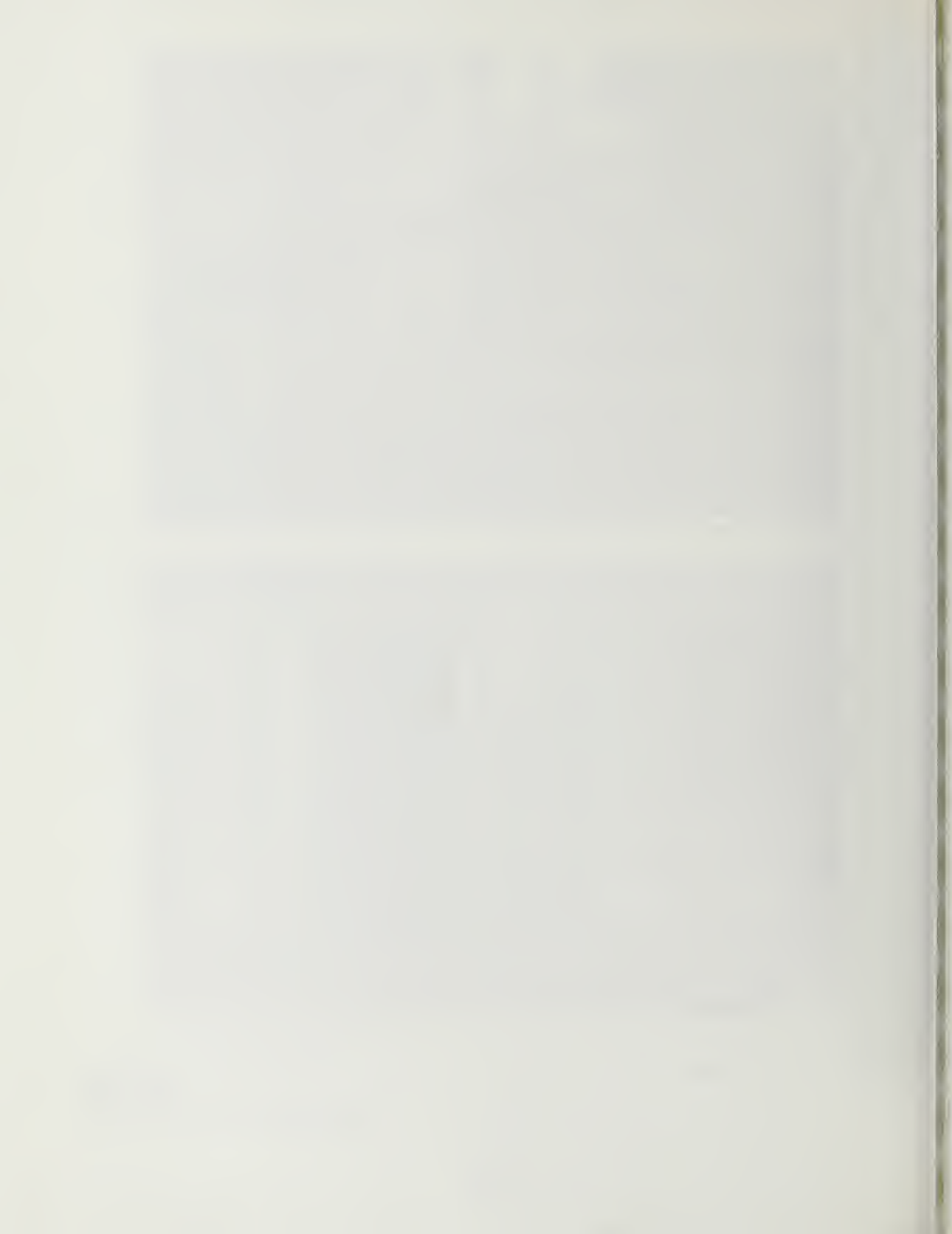


Fulton Street Entrance.

SOURCE: Environmental Science Associates

97.750E Asian Art Museum / ESA 970419 ■

Figure A-2 •
Exterior Views of Old Main Library





Fulton Street Elevation.

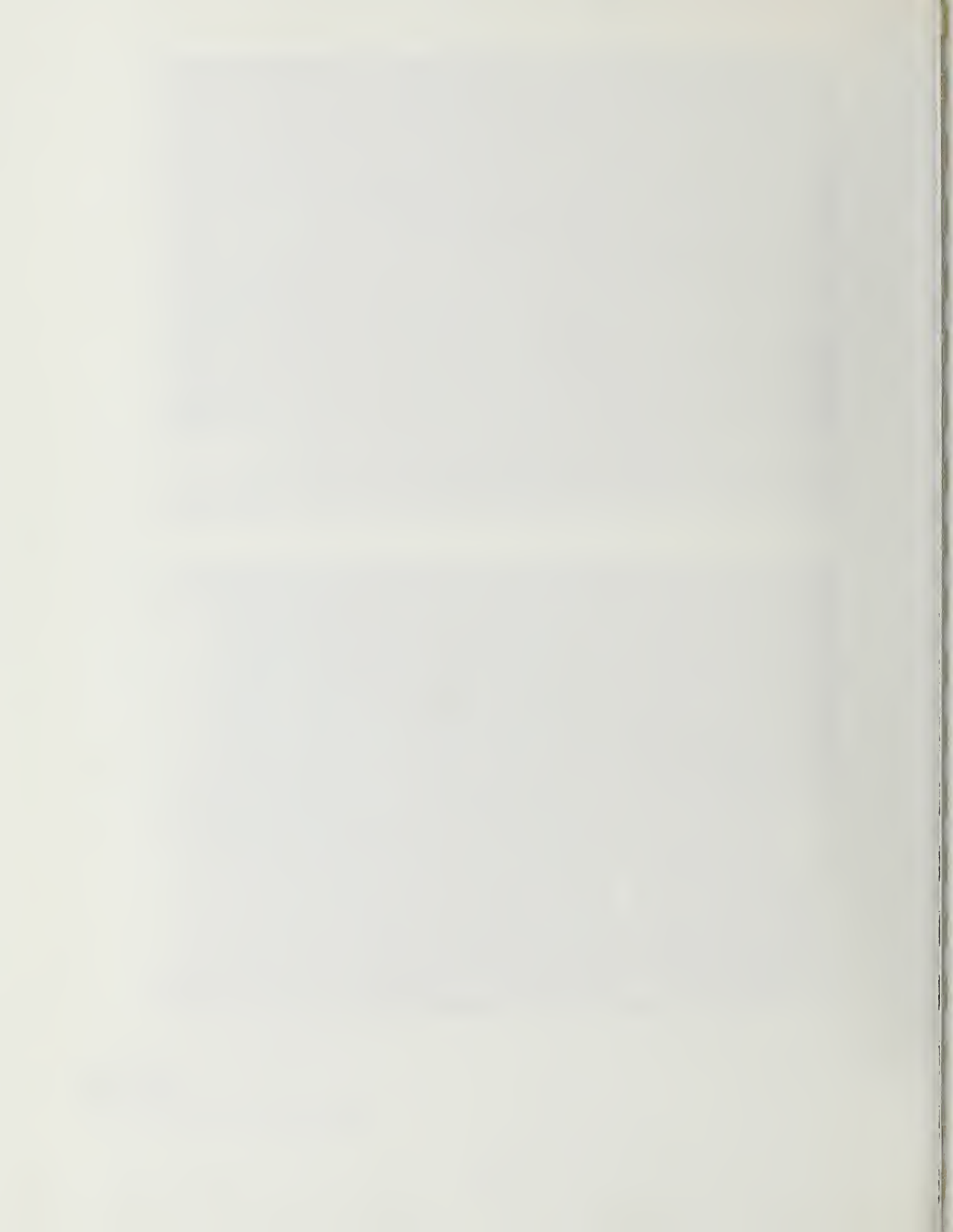


McAllister Street Elevation.

SOURCE: Page & Turnbull

97.750E Asian Art Museum / ESA 970419 ■

Figure A-3 ●
Exterior Views of Old Main Library





Corridor 190, looking south.



Elevator Lobby 192, looking east.

SOURCE: Page and Turnbull

97.750E Asian Art Museum / ESA 970419 ■

Figure A-4 •
Main Floor Rooms



View looking east from Main Floor.

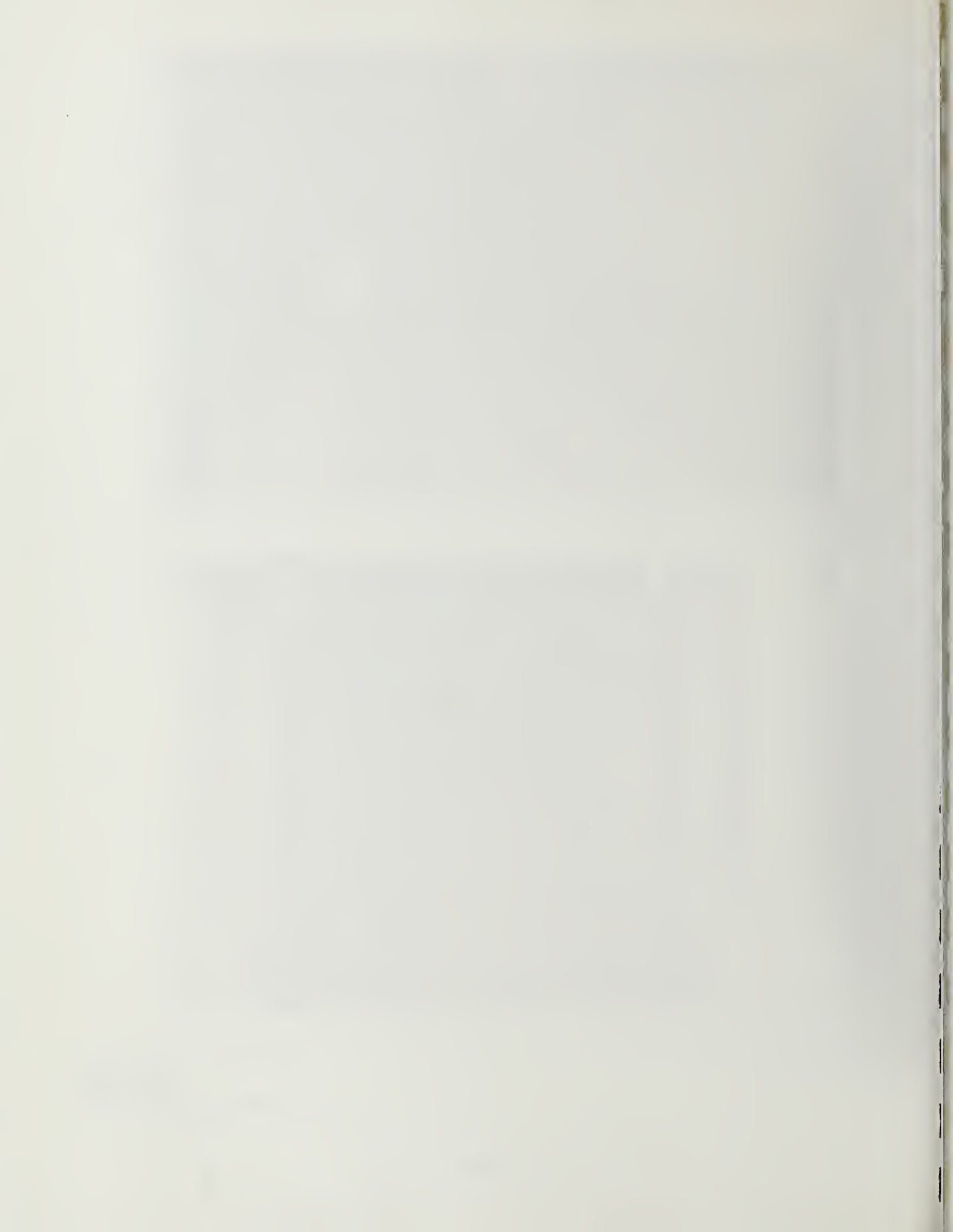


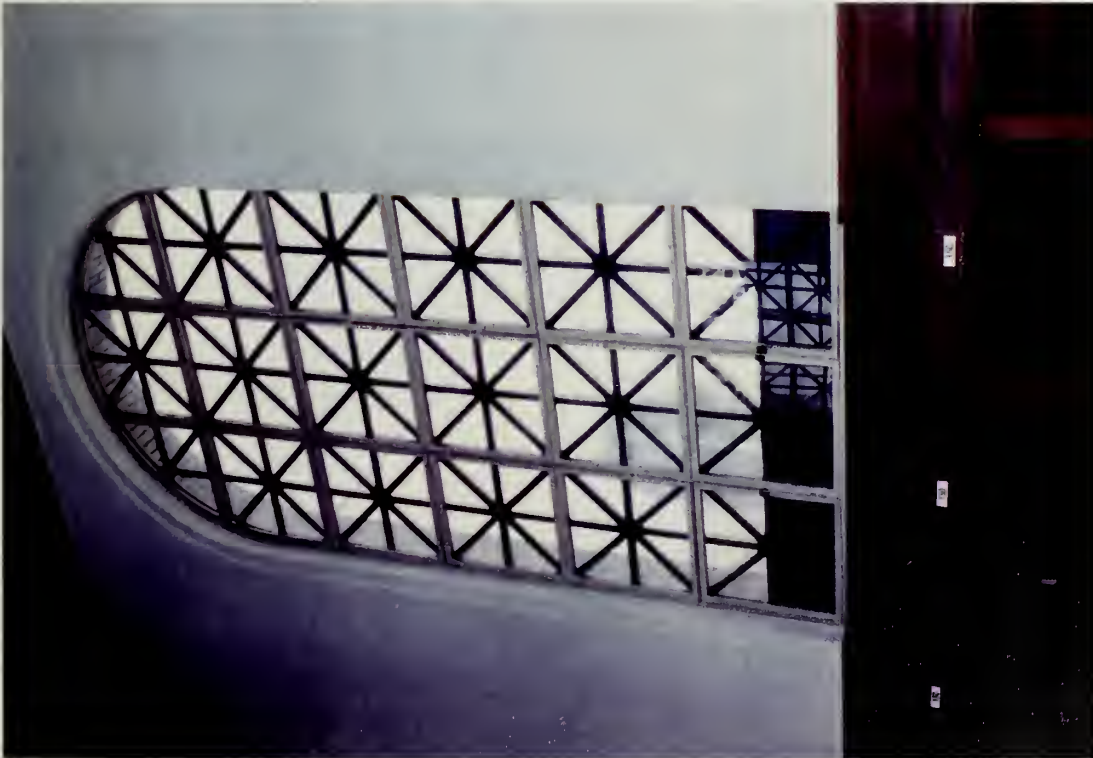
View looking west from Second Floor.

SOURCE: Page & Turnbull

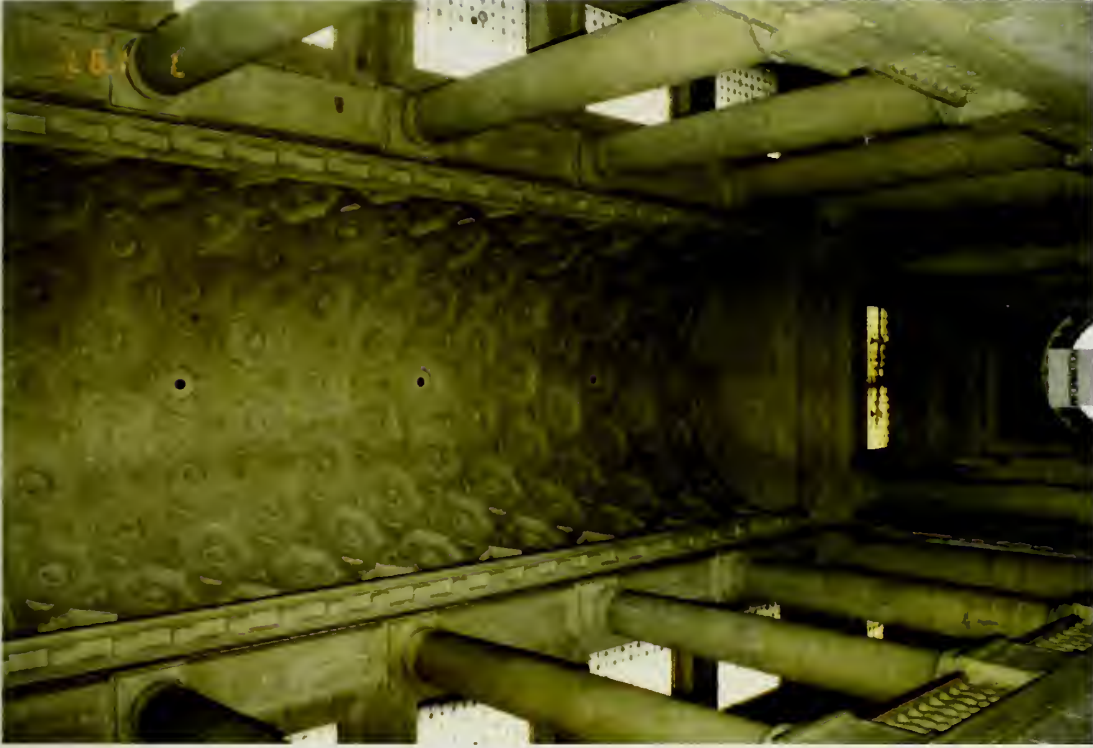
97.750E Asian Art Museum / ESA 970419 ■

Figure A-5 ●
Monumental Staircase (S101)





Room 210. Window in the north wall.



Monumental staircase (S101). Upper ceiling and supporting columns.

SOURCE: Page and Turnbull

97.750E Asian Art Museum / ESA 970419 ■

Figure A-6 ● Second Floor Rooms



Great Hall (Room 200) - looking southwest.

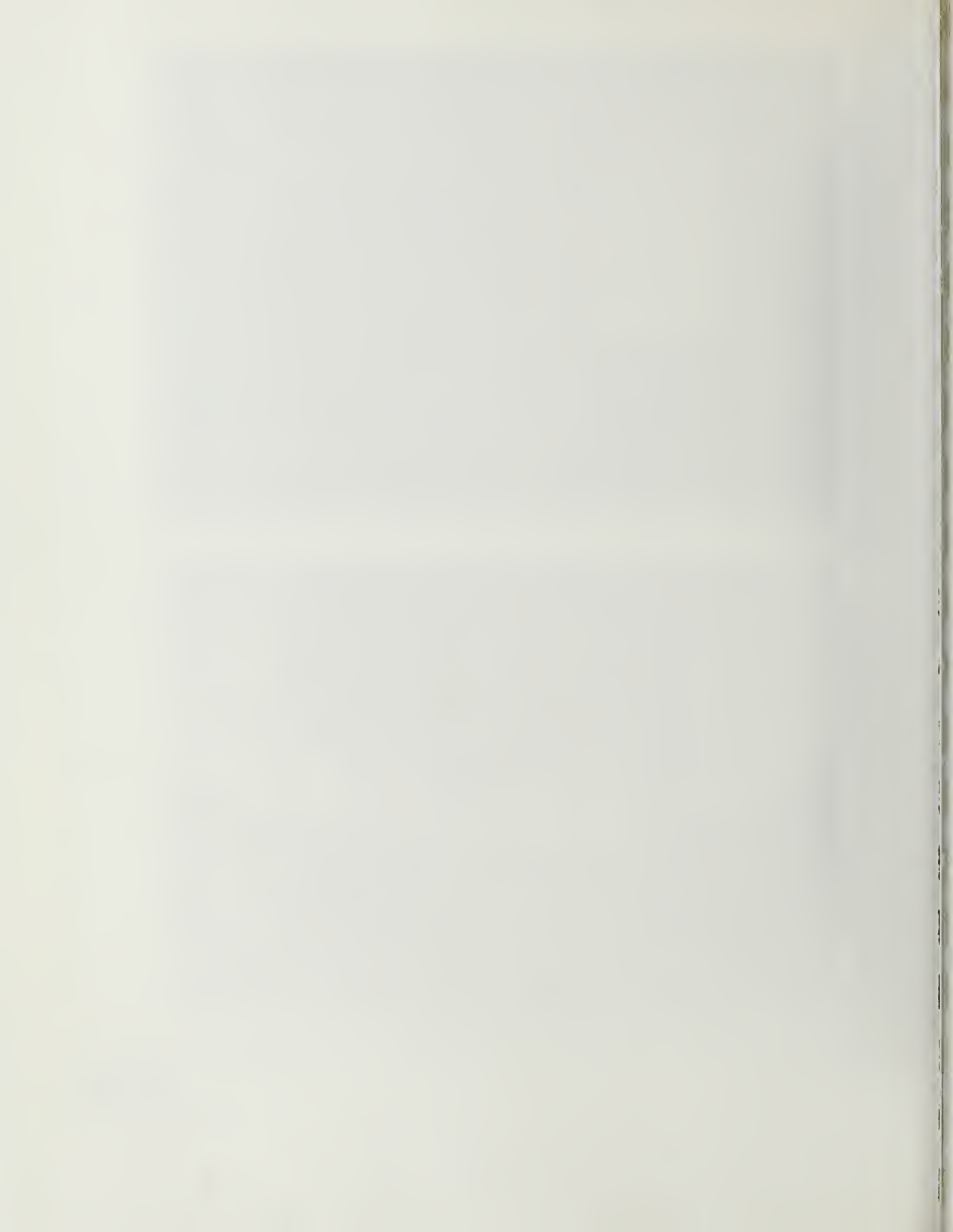


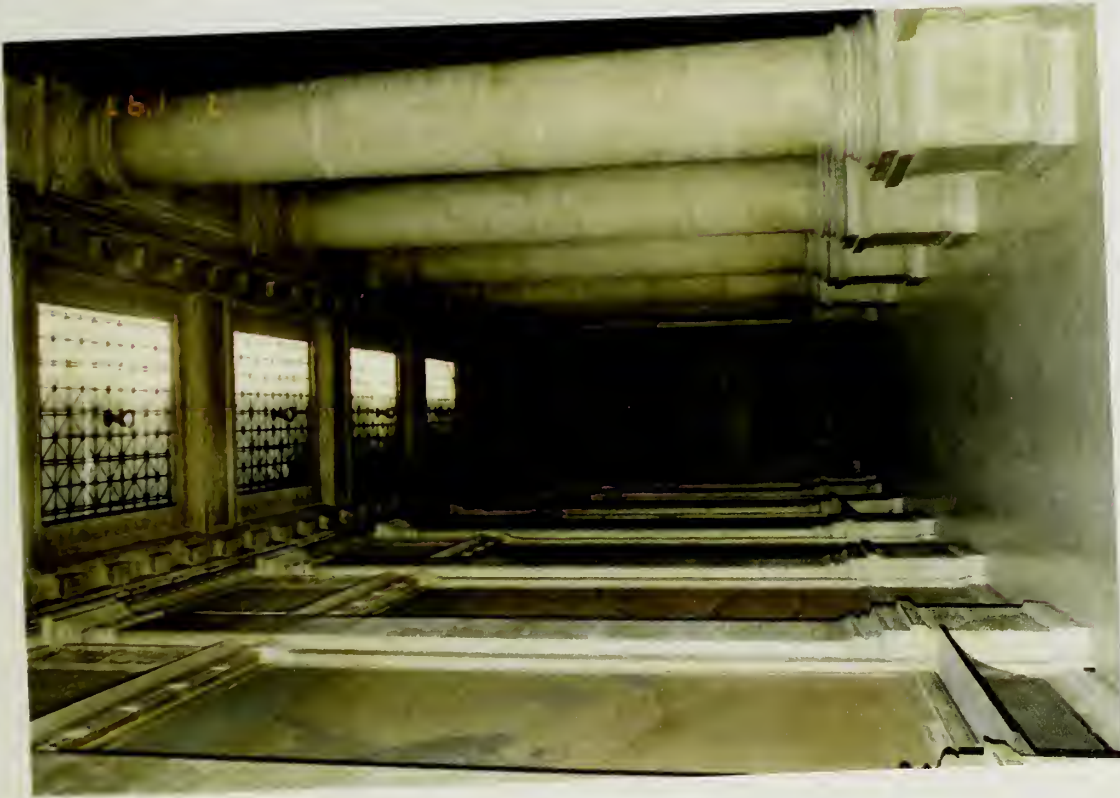
Second Floor Fulton Street reading room (Room 210) - looking east.

SOURCE: Page & Turnbull

97.750E Asian Art Museum / ESA 970419 ■

Figure A-7 ●
Second Floor Rooms





View looking west along the south corridor.

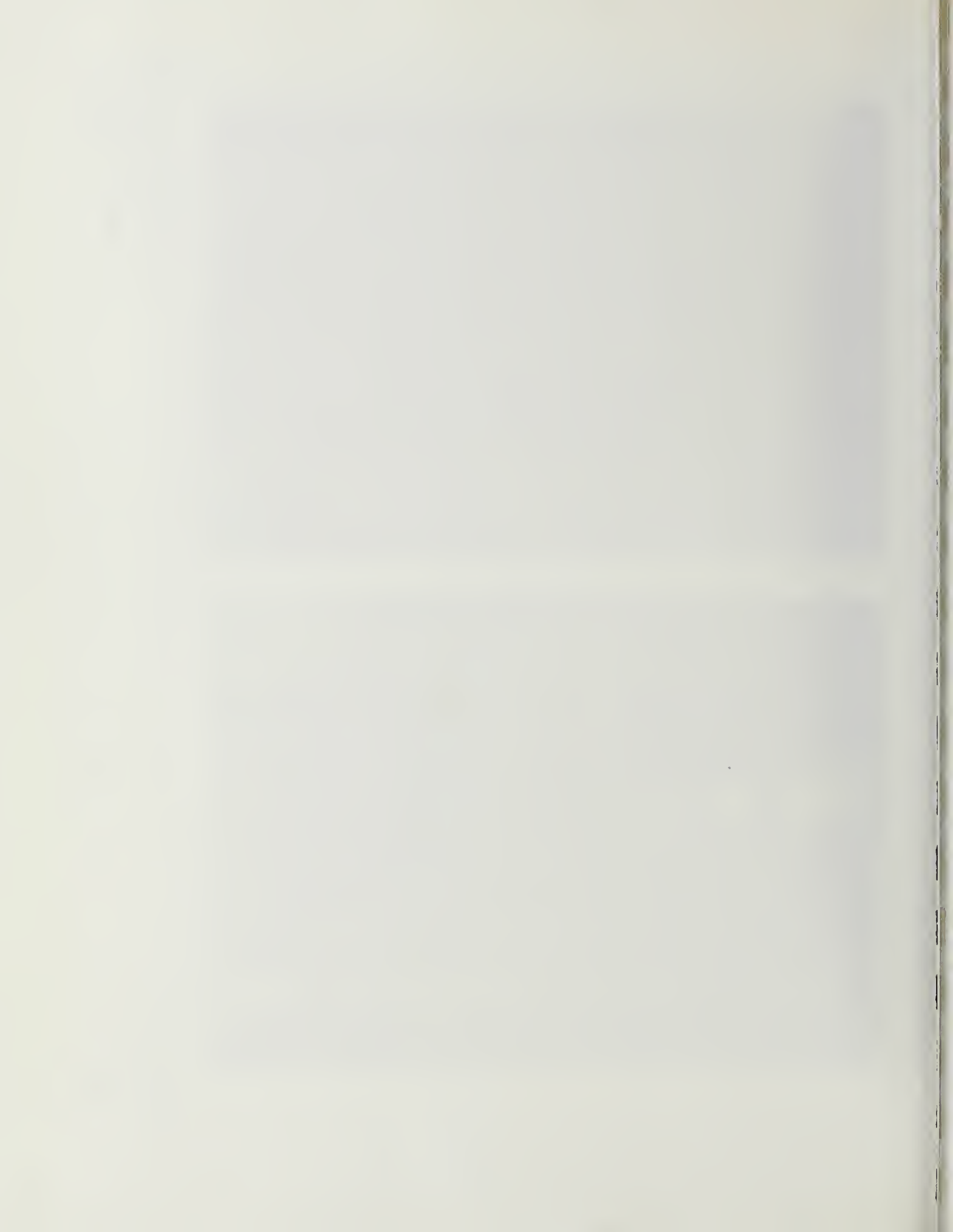


One bay in the north wall, including one panel of "The Sea" by Piazzoni.

97.750E Asian Art Museum / ESA 970419 ■

Figure A-8 •
Second Floor Stair Loggia
Room 290

SOURCE: Page and Turnbull





View looking northwest from the top of the Monumental Staircase (S101).



Ceiling and detail above Piazzoni mural.

SOURCE: Page & Turnbull

97.750E Asian Art Museum / ESA 970419 ■

Figure A-9 ●
Second Floor Stair Loggia
Room 290



The Land (one panel). South side of Stair Loggia.



The Forest. East wall of Stair Loggia.

97.750E Asian Art Museum / ESA 970419 ■

SOURCE: Environmental Science Associates

Figure A-10 ●
Piazzoni Murals A



The Sea (left panel). North side of Stair Loggia.



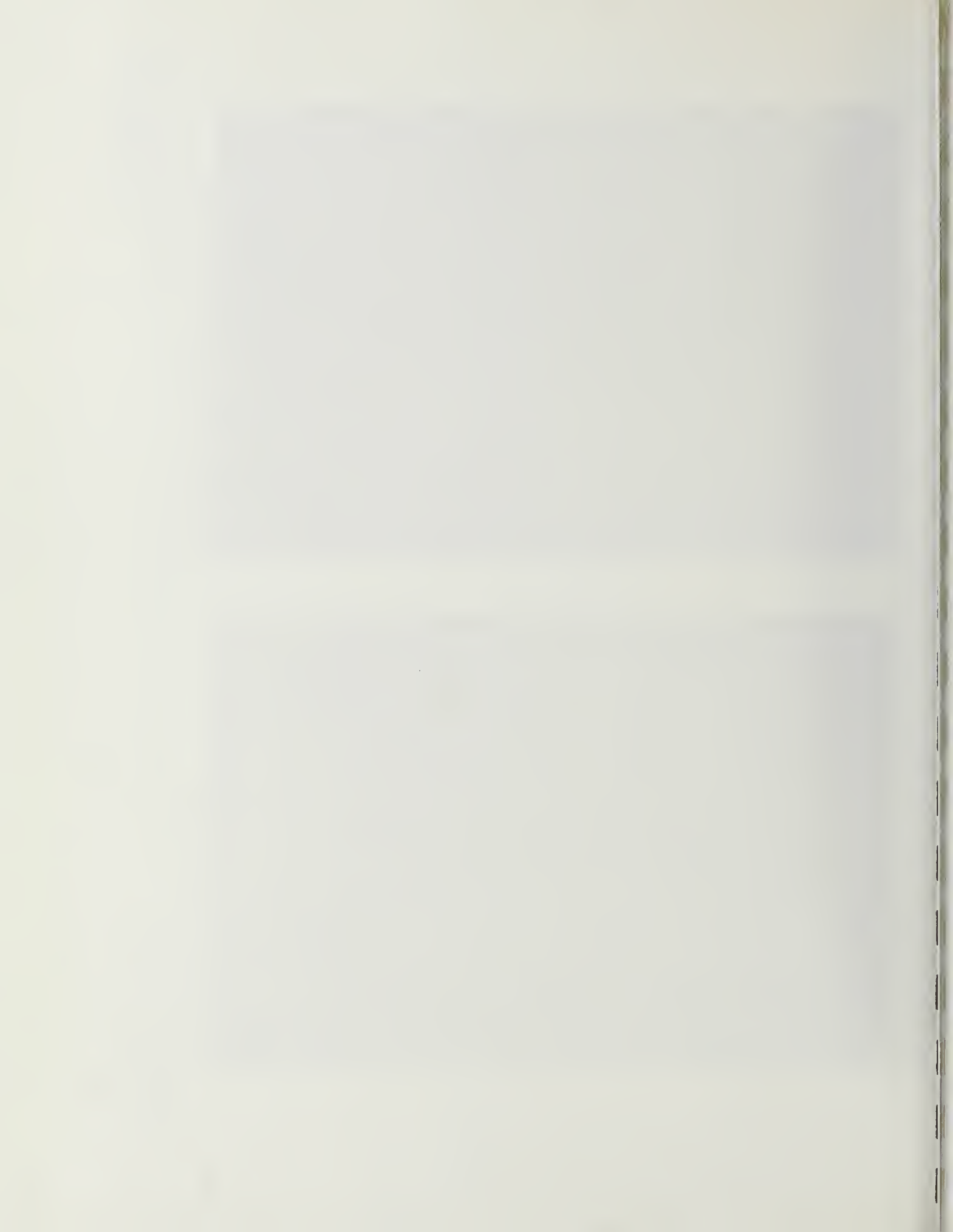
The Sea (portions of two right panels). North side of Stair Loggia.

97.750E Asian Art Museum / ESA 970419 ■

SOURCE: Environmental Science Associates

Figure A-11 •

Piazzoni Murals B





"Pioneers Leaving the East". Larkin Street Reading Room (Room 201).

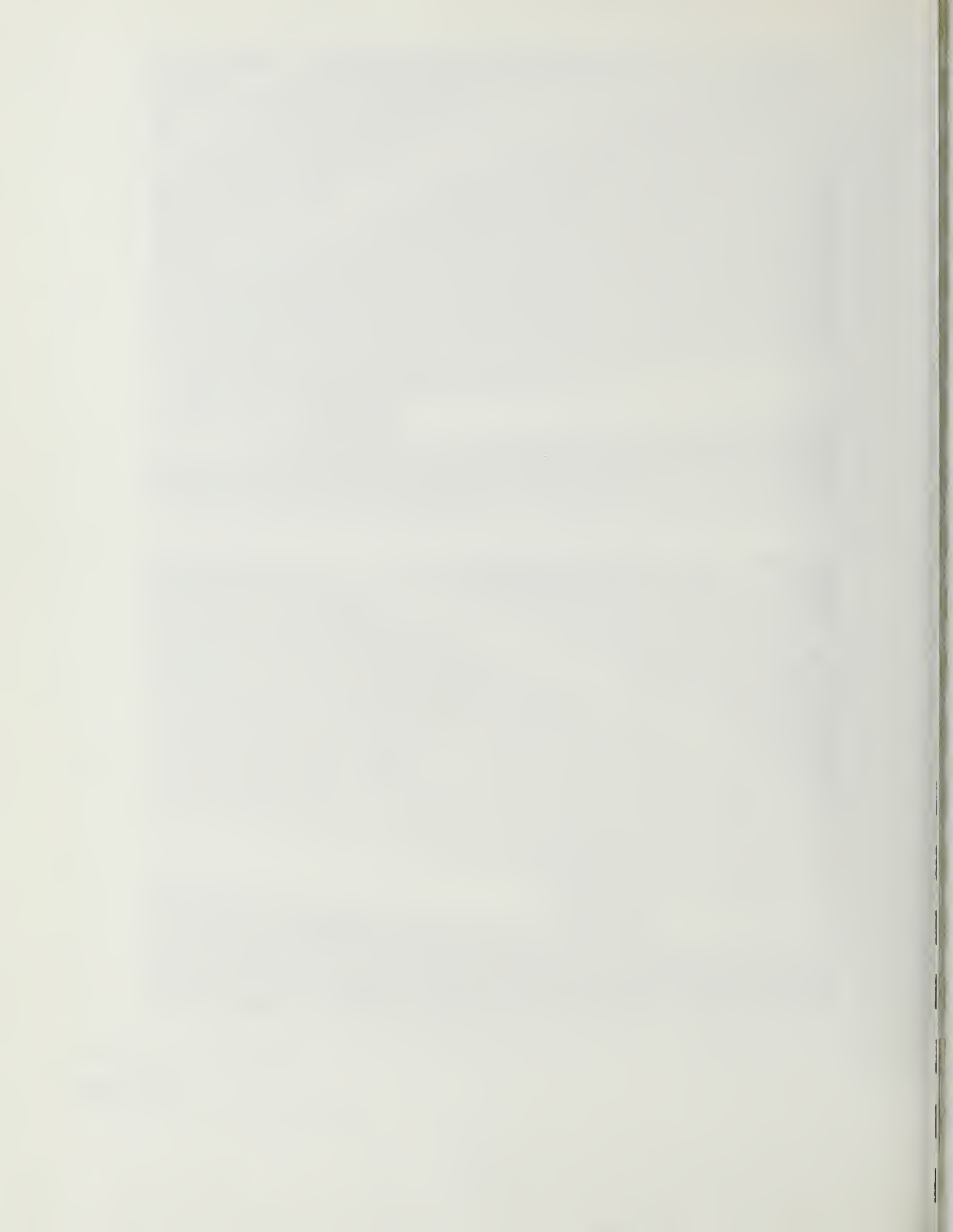


"Pioneers Arriving in the West". Fulton Street Reading Room (Room 210).

SOURCE: Environmental Science Associates

97.750E Asian Art Museum / ESA 970419 ■

Figure A-12 •
Murals by Frank Vincent du Mond



CHAPTER X

EIR AUTHORS AND CONSULTANTS

EIR AUTHORS

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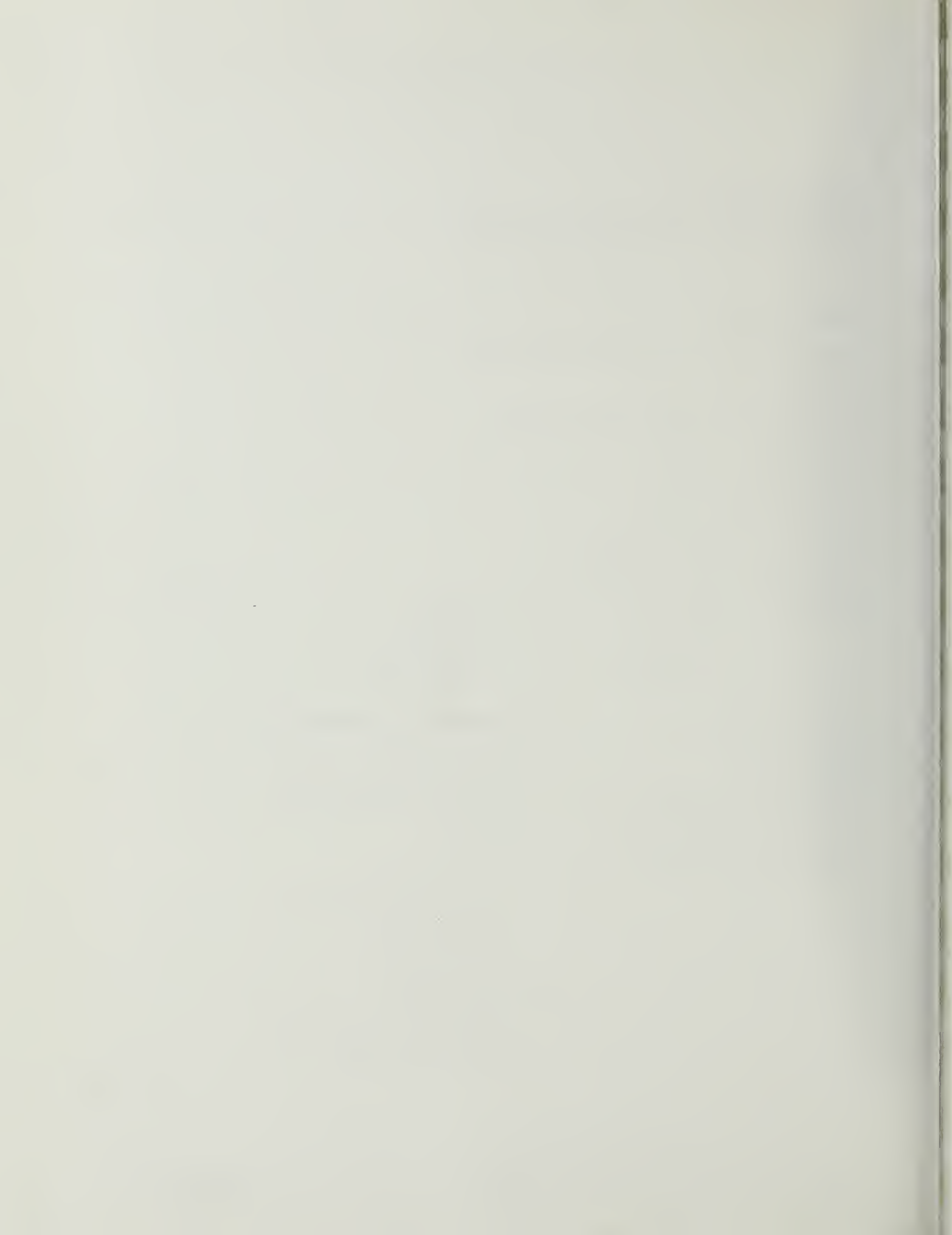
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